

# Sierra Club Lone Star Chapter: TCEQ Comment Submission Guide

- In person at Stakeholder Meetings in Austin (virtual option available), Arlington, and Midland. All in-person comments will be taken on a first-come first-served basis at the venue.
  - i. Austin: Nov. 6, 2024 from 10:00 am - 12:00 pm
    - 1. Where: TCEQ - Austin  
12100 Park 35 Circle  
Building A, Room 173  
Austin, Texas 78753
  - ii. Arlington: Nov. 14, 2024 from 6:00 pm - 8:00 pm  
Where: Arlington City Council Chambers  
101 W. Abram Street  
Arlington, TX 76004-3231
  - iii. Midland: Nov. 20, 2024 from 6:00 pm - 8:00 pm.  
Location TBA; check TCEQ's rulemaking [website](#) for updates.
- If commenting virtually (Austin only), register by **Mon., Nov. 4** by emailing [rules@tceq.texas.gov](mailto:rules@tceq.texas.gov) and providing your name, affiliation (that is, if you represent yourself or an organization), your email address, and your phone number.
- Written comments can be submitted until Dec. 31, 2024. Be sure to include TCEQ's rule project number **2024-027-113-AI**. Submit written comments:
  - iv. Online through [TCEQ's Public Comment System](#)
  - v. By Mail:

Program Supervisor, MC 205  
Texas Register/Rule Development Team - Office of Legal Services  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

## Crafting your comments

You don't need to be an "expert"; your lived experience is expertise enough. Try to keep your comments to three minutes (about 500 words). Write out some notes and practice saying them aloud. The format below can help you structure your thoughts:

- a. Introduction: Introduce yourself, where you live, and why you care about the issue.
- b. Problem: Why unregulated methane pollution is harmful to your community/family. Consider local climate impacts, and harm to air quality and human health from associated emissions.
- c. Solution: The TCEQ has the authority to implement methane rules that will protect Texans and future generations.
- d. Ask: Design a state plan that is at least as protective as the EPA standards.

## Messaging points to consider in your comments

- Pollution from the oil & gas industry and its impacts
  - Methane is a potent greenhouse gas with more than 80 times the warming power than carbon dioxide over twenty years. Methane pollution is fueling climate change and loading the dice for more extreme weather to occur. From Winter Storm Uri to Hurricane Beryl, Texans are already suffering the impacts of extreme storms.
  - Methane pollution from oil and gas development is released alongside other dangerous pollutants, such as smog-causing volatile organic compounds (VOCs) which can worsen asthma and respiratory disease, as well as known carcinogens including benzene and toluene.
  - Texas has more methane pollution from oil and gas than any other states, and we currently have no specific state rules to reduce methane emissions.
  - In addition to action at the TCEQ, the state plan should address routine flaring allowed by the Railroad Commission. Unfortunately, the Commission routinely allows flaring of methane, which if not properly used, can lead to additional methane emissions.
  - VOCs and other pollutants can also contribute to the formation of ground-level ozone, also known as smog, and cities like Dallas-Fort Worth, Austin, San Antonio, Houston, and El Paso already have levels of ozone that are considered dangerous by the EPA. Reducing pollution from the oil and gas industry can help reduce smog pollution.
  - [5.3 million Texans](#) live within a half mile threat radius of an oil and gas site. Oil and gas air pollution disproportionately impacts many historically marginalized or vulnerable communities; living near oil and gas wells is

associated with higher risk of cardiovascular disease, impaired lung function, anxiety, depression, preterm birth and impaired fetal growth.

- TCEQ rulemaking and state plan
  - We need comprehensive rules that reduce emissions at all oil and gas sites and a state plan that is at least as protective as the federal standards.
  - TX needs an implementation plan that covers all wells regardless of age or production volumes. [Nationwide, low-producing wells are responsible for about half of the wellsite methane pollution from the oil and gas industry](#) despite producing a relatively small amount of energy resources. We cannot let these wells and operators off the hook.
  - TCEQ should at a minimum adopt the EPA model rule and allow exceptions to those minimum standards.
  - TCEQ has asked for additional funds from the legislature as part of its legislative appropriations request in part to implement a State Action Plan on methane and TCEQ must have the needed staff and monitoring equipment.
  - The state should consider using state and federal funds to create a system of methane continuous emission sensors to help locate fugitive emissions, including super-producer events. Those sensors could also help industry locate those emissions and then have up to 14 days to fix the issue.