

Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753

Re: Rule Project Number 2024-027-113-AI

Dear Texas Commission on Environmental Quality,

Thank you for the opportunity to submit comments on Texas's implementation of the EPA's Emissions Guidelines, 40 CFR Part 60, Subpart OOOOc, for existing crude oil and natural gas facilities. **As a proud Texan, I am deeply concerned about the impact of oil and gas pollution on our health, environment, and future prosperity.**

Methane pollution is a significant issue in our state. Texas leads the nation in oil and gas production and is also the largest emitter of methane. This super-pollutant has over 80 times the climate-warming potential of carbon dioxide in its first 20 years in the atmosphere. In 2023 alone, Texas emitted approximately 5.9 million metric tons of methane—the equivalent of emissions from over 119 million passenger cars driven for a year. Addressing this problem is essential for protecting public health, combating climate change, and safeguarding Texas's natural resources.

Reducing methane emissions is a critical step toward ensuring cleaner air and healthier communities. Nearly 5.3 million Texans live in proximity to oil and gas facilities, facing increased risks of respiratory issues, cancer, and other health problems. Methane is often emitted alongside other harmful pollutants like volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) such as benzene and toluene. These pollutants disproportionately affect marginalized and vulnerable communities, exacerbating health inequities across the state.

I urge the TCEQ to adopt the strongest possible standards to limit methane emissions, including:

- **Extending fugitive emissions monitoring requirements to all operators.**
- **Reducing emissions from outdated and inherently polluting equipment.**
- **Limiting routine flaring and venting, which waste valuable resources and emit harmful pollutants.**
- **Identifying and addressing super-emitting facilities that contribute disproportionately to pollution.**

Additionally, it is vital that TCEQ avoids overreliance on Remaining Useful Life and Other Factors (RULOF) exemptions. Studies show that low-producing wells generate a disproportionate share of methane emissions, and exempting them would undermine the effectiveness of these standards. Instead, TCEQ should leverage available financial resources, such as federal grants and state programs, to assist operators in reducing emissions cost-effectively. For example, utilizing the \$134 million that TCEQ recently received to help plug

low-producing wells that are no longer productive is a great starting point. The Texas Emissions Reduction Program (TERP) is another important program that can be utilized to help operators go above and beyond the minimum standards.

Strong methane regulations will not only improve air quality and public health but also bring economic benefits. **Reducing wasted methane will increase returns for taxpayers and royalty owners while keeping Texas energy competitive in a global market that increasingly values low-carbon products.**

By implementing these standards, **Texas can lead the way in addressing climate change, protecting public health, and ensuring a sustainable future for all Texans.** I thank the TCEQ for its efforts thus far and encourage the timely and transparent implementation of these rules.

Sincerely,