

## David Pavelchek

I support increasing liability coverage requirements for entities covered by the proposed regulation to at least the level required for marine transport. There is no reason to believe that the maximum credible accident is less costly than for marine traffic. The petroleum industry overall has large under-funded liabilities, from toxic cleanup, to well retirement, to climate pollution to disinformation. There are also patterns of shedding liabilities to under-funded entities. Protection of the citizens from being forced to pay for these risks requires realistically large financial liability requirements. Appropriately large liability coverage requirements will also encourage more care in avoiding accidents.