

January 13, 2025

Dear Sirs and Madams,

I have become aware of your online presentations. For over forty years, I have been part of a ranching family in Jones County, Texas and have owned an independent family owned oil and gas production company located in Abilene.

We raise cattle, engage in wildlife conservation and work diligently to improve, preserve and upgrade the quality of the land and surrounding environment. We have over 20 employees and use many local contractors, of course, and support our community in many ways.

We are in favor of environmental activities for which the cost does not outweigh the benefit. As written, the cost of OOOOc will kill small operators in the Big Country. First, the cost of a VRU (vapor recovery unit) for one tank battery is well over \$50,000. This does not include a minimum of \$25,000 for installation and maintenance. Adding these expenses to low volume stripper wells will reduce their economic life by several years if not immediately killing them and the jobs and communities they support. Killing marginal or stripper wells will cause an immediate waste of valuable natural resources on which our communities, state and nation rely. Second, even if vapors from marginal wells could be economically captured, the next problem is getting rid of the vapors! Pipeline companies will not purchase or take small volumes of gas. Pipeline companies particularly will not take shallow gas with high nitrogen content because it does not yield enough BTU's to make it economical (this means that the vapors, if any, contain minimal amounts of methane at best). The folks that drafted OOOOc completely failed to address these realities. By failing to address the off-take issue, the small operator is left with flaring which also requires expensive equipment and maintenance costs that reduce the economic life of the well and pose fire and other environmental concerns. The Texas Government Code requires state agencies to do economic impact studies for rural and small businesses. If these studies are done, I am certain that the TCEQ will see that the economic cost of OOOOc regulations on small business and rural communities will far outweigh any alleged environmental benefit.

Please take in consideration that volume matter. Associated gas from a stripper well on the Eastern Shelf is not the same as a horizontal shale producer in the heart of the Permian or Delaware Basins. Common sense and economic impact is a must.