

Comments to TCEQ regarding OOOOC Rulemaking  
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1. I would like to see a cost/benefit analysis of the effect of these rules if fully implemented. The compliance cost will be significant, which will in turn affect the profitability of marginal wells/leases held by small operators. Even if operators elect to plug a stripper well, the OOOOC rules still require testing and documentation.
2. The goal of these regulations is zero emissions. This is not attainable by any means. Wells have to be pulled and serviced, separators require maintenance, leaks develop, tanks emit vapors, VRU's are notoriously unreliable - all of these are just a few examples of routine matters in the oilfield that result in gas/methane being emitted. There is no way to completely eliminate this from happening.
3. There are requirements that will affect oil haulers in that pressure relief valves on trucks will be required to be connected to either a vapor recovery unit or gas pipeline in the event a small volume of gas is vented off the truck while taking on a load of oil. What if there is no VRU? What if there is no gas pipeline connection? Where is an operator supposed to send that puff of gas that may be emitted by the transport? Connecting a tank truck to a VRU or pipeline is not safe either, it's just one more way for things to go wrong.
4. These proposed rules come with extensive testing and documentation requirements. The OGI testing requires detection cameras that cost tens of thousands of dollars. No small operator can afford this. Moreover, there are OGI training requirements if an operator wants to do their own testing. This training takes people away from maintaining their production, it requires significant expense for the classes and lodging/meals. Follow-up training will most likely be required that further increases this burden on small operators. Documentation is expensive, audits by TCEQ would no doubt result in violations with regard to proper record keeping. Using consultants for testing and/or documentation will be very expensive, especially given that testing will be multiple times per year.
5. Leaks/release incidences are a part of the oilfield. We are exploring for and producing fluids that are volatile and corrosive, operators from Mom and Pop all the way up to Exxon have issues because of what we are handling. These utopian nonsense regulations have no basis in reality, and will do nothing to make the world better. What they will do is handcuff efficient production and refinement of fossil fuels, which will only further drive up the cost of energy, which in turn increases the cost of everything. One only need look at the abysmal record of the current administration to see the effect of over-reaching energy regulations on the cost of living. Putting OOOOC into practice will only exacerbate the problem.
6. The volumes at which some reporting and documentation are required are so small that measurement is essentially impossible. 3 cubic feet per day is too small to measure using any type of normal recording device. Moreover, volumes this small have zero negative impact on quality of life or safety.
7. These rules will devastate small operators, and it will drive up compliance costs for all operators significantly. Instead of trying to devise rules for which compliance is an impossibility, TCEQ should instead be filing a lawsuit against EPA. This federal agency has mandated compliance with standards which cannot be met in any practical sense of reality.