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TCEQ – Stakeholder Input for RPN 2024-027-113-AI 2024 /
OOOOC Rulemaking and State Plan

Dear TCEQ:

I understand TCEQ would like to put in place state regulations regarding methane capture, with its' main goal being zero omissions. The costs and means being outlined and associated with this are not even conceivable to a small, private operator.

I work for a small family-owned oil and gas company that has been in business for over 50 years. With every well we have ever operated, we have always complied with state & federal requirements, as well as the other small oil and gas companies out there, otherwise, we would not be in business.

If these new standards are implemented, the RRC and other entities that govern oil and gas activity in various states will have a much larger problem to deal with. Small operators will immediately go out of business, leaving the management and ultimately, the plugging to the state (or federal) entities.

I strongly suggest TCEQ do extensive economic impact studies, as I know the results will show OOOOC is not feasible, nor practical for the small operators that manage the majority of the wells in this country.

Sincerely,

Kelly Blackwood
President/CEO