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CONSERVATIVES FOR RESPONSIBLE STEWARDSHIP

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COMMENTS TO THE TEXAS COMMISSION for ENVIRONMENTAL QUALITY

December 27, 2024

TCEQ Rule Project #: 2024-027-113-AI

RE: Natural Gas Waste and Methane Rules

Dear Commissioners:

Conservatives for Responsible Stewardship (CRS), on behalf of its more than 1,000 Texas members, strongly urges you to establish new standards to reduce natural gas waste by curtailing oil and gas industry methane emissions via leaks and unnecessary flaring.

As a conservative organization, we believe strongly in the old adage “*waste not, want not.*” This is especially important with respect to natural gas, since an ever-growing portion of our domestic production is being shipped overseas.

Currently about 13% of U.S. natural gas production is exported as liquified natural gas (LNG), within five years that is expected to grow to more than 20%.

Not only does this affect the price of gas for American consumers due to supply and demand, but also because buyers in Europe and Asia are bidding up the price of U.S. gas.

Wasting natural gas through methane emissions can compound the potential price impact on U.S. consumers. It’s estimated that last year oil and gas operators in Texas wasted 5.9 million metric tons of natural gas via leaks and flaring.

And the state of Texas did not get a dime in royalties for any of that 5.9 million metric tons of wasted gas.

Utilizing common sense best practices and cost-effective technologies to reduce methane emissions is not only a winner for gas customers, it also helps protect taxpayers in Texas and across the country.

Moreover, implementing these safeguards will ensure that the energy industry in Texas remains globally competitive as lucrative overseas markets increasingly require cleaner, more sustainable sources of energy.

Methane is truly the low hanging fruit when it comes to safeguarding our air quality, atmosphere, and climate. By requiring simple best practices that prevent waste and bring more gas to market, TCEQ can also reduce harmful air pollution.

Texas is also home to a growing methane mitigation industry, with at least 69 separate headquarters across the state.

This is truly a win-win opportunity, where action to prevent fugitive emissions will also help protect Texas' leadership in America's energy future.

We ask TCEQ to develop strong, comprehensive rules to reduce natural gas waste via methane emissions at all oil and gas sites. Texas needs a state implementation plan that covers all wells regardless of age or production volumes.

It's worth noting that, nationwide, low-producing wells are responsible for about half of the wellsite methane pollution from the oil and gas industry despite only producing only scant amounts of oil and gas.

Thank you for your time and attention to this matter. Conservation is conservative, and I look forward to genuinely conservative leadership from you in reducing natural gas waste, protecting consumers, and safeguarding Texas' air quality.

Sincerely,

A handwritten signature in blue ink that reads "David Jenkins". The signature is fluid and cursive, with the first name "David" and last name "Jenkins" clearly legible.

David Jenkins

President