

From: [Luke Dunn](#)
To: [Rules](#)
Subject: RE: Stakeholder Input for RPN 2024-027-113-AI 2024 / OOOOc Rulemaking and State Plan
Date: Monday, January 13, 2025 9:17:16 PM

January 14, 2025 @ 03:15am

RE: Stakeholder Input for RPN 2024-027-113-AI 2024 / OOOOc Rulemaking and State Plan

Dear Commissioners,

I'm writing to encourage the TCEQ to pause implementation of the proposed methane regulation plan under the Section 111 methane rule. Moving forward now would impose unnecessary burdens on Texas's vital oil and gas industry and the communities that depend on it. Instead, waiting for potential changes under a new administration would allow for a more balanced and economically viable approach.

Methane makes up just 0.00017 percent of the earth's atmosphere, measured in parts per billion (PPB), compared to oxygen and nitrogen, which account for 21% and 78%, respectively.

Moreover, the oil and gas industry has made remarkable strides in reducing methane emissions, thus bringing more affordable and reliable energy to market. According to the Texas Independent Producers & Royalty Owners Association (TIPRO), between 2011 and 2022, methane emissions intensity in the Permian Basin fell by nearly 85% while production increased by 416%. From 2019 to 2022, the U.S. cut flared volumes by more than half, with the Permian Basin showing flaring intensity 91.5% lower than in Russia and 24.2% lower than in Venezuela. These facts underscore that the industry is already addressing emissions responsibly without excessive federal intervention.

The methane rules developed under the Biden administration, particularly the Methane Tax (Waste Emissions Charge) and associated regulations, impose undue burdens on American oil and gas operators, especially small producers who lack the resources of multinational corporations. These rules are part of a broader agenda that threatens not only our state's energy independence but also the livelihoods of countless Texans who rely on this industry.

Texas has proven time and again that we are capable of managing our natural resources responsibly. By creating a state-specific framework, TCEQ has the opportunity to protect the environment and groundwater without hindering the entrepreneurial spirit that makes Texas the energy capital of the world. I urge you to:

1. Continue resisting Washington's overreach. Federal agencies do not understand Texas's unique energy landscape and have consistently pursued policies that prioritize political goals over practical realities.
2. Pause implementation of a state-specific methane rule. With President Trump's election, there is renewed hope for rolling back onerous regulations such as the Methane Tax through reconciliation or the Congressional Review Act. Adopting a minimal compliance framework now would provide operators with immediate relief and allow time for legislative changes to take effect.
3. Stand firm against radical special interest groups. Organizations like the Sierra Club and

Citizens Climate Lobby are more interested in advancing anti-oil-and-gas agendas than genuinely protecting our environment. Their proposals would lead to job losses, higher energy costs, and a weakened Texas economy—all while doing little to address actual environmental concerns. Listen to Texas oil and gas businesses because they are the ones creating jobs, driving economic growth, and keeping the lights on for millions of Texans. Passing stringent methane regulations will only lead to the premature plugging of marginal oil and gas wells — many at the state's expense.

The oil and gas industry is the backbone of Texas, providing hundreds of thousands of jobs, supporting local communities, and ensuring that families have access to affordable and reliable energy. By maintaining a balanced regulatory approach, TCEQ can protect our state's prosperity while maintaining our environmental leadership.

Thank you for your leadership and dedication to keeping Texas strong. I trust you will continue to prioritize the interests of Texans and resist unnecessary interference from Washington and activist groups.

Sincerely,
Luke Dunn
2813 Happy Trails Dr,
Midland, TX 79705
ludunn@hotmail.com
432-818-0300