

Charles Nunu

Program Supervisor, MC 205
Texas Register/Rule Development Team - Office of Legal Services
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Ref: TCEQ's rule project number 2024-027-113-AI

Dear Program Supervisor,

My name is Charles Nunu, and I am writing as a decades long citizen involved in SIP and rule making across Texas. My recent affiliations include Creation Care Champion with the Evangelical Environmental Network, Citizen Climate Lobby and various programs and initiatives sponsored by Rice's Baker Institute and Center of Energy Studies.

I am, a private citizen. There is urgency in the toughest SIP rule making as it affects not only Methane, but aquifer and water contamination at a critical period of our history and demographic future.

Thank you for acting swiftly to propose a State Implementation Plan to cut methane and other harmful pollutants from new and existing oil and gas operations in Texas. We have seen how effective the TNRCC/TCEQ can be in reducing Nox and HRVOC's. It is important that we do not let past extraordinary successes in Non Attainment regions, presume we can beat current environmental resistance due to cost or politics. In order to Save human life, we must first do no harm. A tough SIP is required.

While I concede that the cost and structure of orphaned wells is enormous, the RRC has been slow to act. This has pushed the problem not just for methane leaks but to ground water contamination. Wells can cost anywhere from 100K each to upwards of 10X for the dirtiest . There are at least 6500 in Texas alone.

AS Christians and boy scouts, we have a duty to keep nature unharmed. Texas has seen extraordinary population growth, without the necessary conservation of water and waste Methane; like NOx, VOC's pm 2.5 and HRVOC's are harmful and were fully implemented. Industry was very quick and effective to reduce those pollutants.. in 2005 Stationary sources were 75% of the pollution in the * 8 County (Houston Galveston Area) today it is 23%.. (Mobile sources are better left for a another discussion.)

While the costs are unknown on any given site, the averages tell us that jobs, restoration of area land, water and well clean up will benefit all Texans economically and spiritually. We must lead the country in showing an effective way to clean up historical messes left for poisoning Nature and our children.

While I concede that Siberia is leaking more Methane than any where else on earth.. we are obliged by both faith, and our duty to take care of our patch of earth as best we can. It is our moral compass. It is the memo we received from GOD though most forget.

I beg you to use all your good offices and skills to push this forward for our children, For our lands, water, cities, and uplift the aspirations to make us leaders in Clean up.. following in the footsteps of Texas grandest Dame Lady Bird, Champion of Conservation efforts here. .. It is a mindset.. and it can be done with your leadership and our support.

I urge you to swiftly create a SIP that is at least as protective as the EPA standards for the future and for our legacy and because it is the right thing to do morally even if painful.

Thank you ever so much,

I remain at your service as needed for further elaboration.. Thank you for your continued leadership in difficult times.

Kindest Regards,

Charlie Nunu
cIn