

Diane Tasian

Commentary re methane regulation in Texas to TCEQ 24-1228. Rule Project # 2024-027-113-AI

My name is Diane Tasian. My husband and I have lived in the Uptown area of Dallas for 20 years. Air quality has been an issue since I moved to Dallas in the early '70's. We now have children and grandchildren living in Dallas and Houston.

A recent article in the Dallas Morning News (DMN) reported that North Texas ozone levels are getting worse. That "D-FW area currently classified as severe nonattainment zone". In another article, I saw that North Texas has been out of compliance with EPA regulations for decades and may be paying fines beginning in 2027.

So, when I heard about TCEQ reaching out for resident input on methane I did a bit of internet research because the DMN article didn't mention methane – just ozone.

Basic info on methane shows it is invisible to the human eye, is odorless, and is a key component of ozone. I found the TCEQ Air Quality Maps which quantify ozone and particular matter (PM 2.5). But then got I lost in a confusion of terms – air pollution, smog, ozone, and ground level methane. I also came across many articles about how harmful methane is to all growing things, making it an issue for ranching, agriculture, and forestry too.

To me the fundamental questions are "Is methane being regulated in Texas?" and its corollary "If not, why not?" I attended a TCEQ public input session in Arlington on November 11, 2024, and got the answer to my first question: that Texas is not regulating methane specifically although it is a major component of smog. And that it is proven to be a cause of illness. The answer to the "Why not?" question is less clear, but with our legislature and bureaucracy so beholden to the oil and gas industry I assume the answer lies there.

Here are my recommendations:

1. Educate the elected officials on this issue and request adequate budget for implementation. The Legislature begins January 14, 2025, and won't be reconvened for regular session until 2027. That is too late to avoid penalties.
2. The state methane plan can't wait until 2026. That won't be enough time to role out new requirements and begin to hold offenders accountable in time to reduce the fines from EPA beginning in 2027.
3. At a minimum the state methane plan must meet federal requirements. It needs to be front-end loaded with requirements that exceed federal guidelines because we are currently so far out of compliance. Relaxation of requirements should be tied to how effectively the offenders are meeting the guidelines in addition to specific deadlines.
4. The state methane plan should have stiffer penalties for oil and gas and other emitters in urban settings and there should be scientifically based minimum distances from schools, playgrounds, daycare, and hospitals.
5. The state plan should have a clear listing of the sources of methane, including lost abandoned wells, and how each of these sources is being monitored and held accountable. Penalties as guidelines and deadlines are missed should rise exponentially.
6. All existing monitors should be upgraded to provide methane levels, should be more consistent in their performance, and should function 24/7. There are a variety of monitors in the field. A review of the TCEQ Air Quality Maps reports shows some sites are documenting far more variables than

others.

7. New monitors should be added and strategically located. My brief study of the TCEQ Air Quality Maps showed that in the DFW area there are some monitors distributed to catch prevailing winds. However, to be more strategic, I recommend that monitors be placed on the northwest and southeast edges of facilities that have been proven offenders and regions of high population. These monitors could be placed in public easements. I also recommend that portable air monitoring information be included.

8. TCEQ website improvements:

a. I searched their website for information and found the Air Quality Maps which quantify ozone and particular matter (PM 2.5). The maps need to begin quantifying the amount of methane and other major components of ozone.

b. Provide a glossary of acronyms and abbreviations used in the reports.

c. It would also be helpful if we could create regional or group reports depending on the prevailing winds. For example, in the Dallas area it would be helpful to know the levels based on wind directions. TCEQ air monitor locations that might give the most comprehensive picture of Dallas:

i. From the northwest: Dallas North No. 2 C63/C679 -- 12532 ½ Nuestra Dr. (SE of the tollroad and LBJ) and Dallas Hinton St. C401/C60/AH161-- Just west of W.P. Clements Hospital

ii. From the southeast: Italy C1044/A323 -- Due South and Kaufman C71/A303/X071 -- East southeast

iii. These stations may miss Dallas proper: Dallas Executive Airport -- 3277 Redbird Lane (west southwest) and Rockwall / Heath C69 -- East northeast

d. Include MethaneSAT and MethaneAIR data. <https://www.methanesat.org/>

9. The state plan should include strategies and timelines for identifying lost and abandoned wells.

In conclusion, I would like to thank TCEQ for having public input sessions as they work to comply with federal regulations. And I look forward to the draft plan and hope there will be more sessions for public input.