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As written, the OOOOc rules would render the operation of plunger wells impossible overnight. The rule has no basis in reality when it comes to operating oil and gas wells and, as best I can tell, is meant only to leverage a regulatory load onto the operators that is unbearable and will result in thousands of wells being plugged (or shuffled onto the state orphan list) and hundreds of millions in lost tax revenue to the state and also to local, rural school districts. Furthermore, it directly disadvantages the small, independent operators who make up a miniscule amount of methane & CO2 emissions without addressing the large independents or majors, who make up an inordinately larger percentage of the emission picture. As written the rule is untenable.