

Richard Beyea

Please see attached.



Texas Commission on Environmental Quality
PO Box 13087
Austin, Texas 78711-3087

Commissioners and Rules Coordinator,

We appreciate the time and care TCEQ has taken in reviewing the proposed federal methane rules. While we applaud your efforts to maintain primacy in the rule making process, much of what is being implemented will have detrimental effects on our operations, companies, royalty owners, and in the end our communities and schools. If you want less of something: tax it. That's what the people of Texas will receive without intelligent implementation of these rules.

The industry sells methane, as you are well aware, but perhaps doesn't get adequately conveyed to Washington DC. We do not intentionally waste our product. Ninety three percent (93%) of our operating wells in our area are generally classified as minimal producers. Under the proposed rules as configured, the economic effects will be dramatic. Operationally, much of the low volume operating procedures that are used today to extract the remaining reserves from these wells will be prematurely abandoned, orphaned, or plugged, if additional large costs are added to these wells. De-liquification with pumping equipment and the required associated electrification requirements are too much to bear economically for these marginal wells. While the number referring to "the majority of emissions are from small wells" any "polluting" emissions stream is forever a matter of volume and concentration (see the compressor and dehydrator stack requirements). Reality matters not percentages.

I am a local school board trustee and our revenues from oil and gas operations to the school system on the local side are approximately 47% of our revenues. State revenues also reflect these produced volumes. PISD cannot survive without this local tax base. I urge you to consider the total impact on the Texas economy with these rules. Please minimize these impacts on our lives and businesses and communities.

Thank you.

Richard Beyea
President
Remnant Energy, Inc.