

# John MacFarlane

As the Conservation Chair of the Greater Fort Worth Sierra Club, I am submitting comments and also because Tarrant County is at the heart of methane extraction.

>Texas has more methane pollution from oil and gas than any other states, and we currently have no specific state rules to reduce methane emissions.

>In addition to action at the TCEQ, the state plan should address routine flaring allowed by the Railroad Commission. Unfortunately, the Commission routinely allows flaring of methane, which if not properly used, can lead to additional methane emissions.

>VOCs and other pollutants can also contribute to the formation of ground-level ozone, also known as smog, and cities like Dallas-Fort Worth, Austin, San Antonio, Houston, and El Paso already have levels of ozone that are considered dangerous by the EPA. Reducing pollution from the oil and gas industry can help reduce smog pollution.

>We need comprehensive rules that reduce emissions at all oil and gas sites and a state plan that is at least as protective as the federal standards.

>TX needs an implementation plan that covers all wells regardless of age or production volumes. Nationwide, low-producing wells are responsible for about half of the wellsite methane pollution from the oil and gas industry despite producing a relatively small amount of energy resources. We cannot let these wells and operators off the hook.

>TCEQ should at a minimum adopt the EPA model rule and allow exceptions to those minimum standards.

>TCEQ has asked for additional funds from the legislature as part of its legislative appropriations request in part to implement a State Action Plan on methane and TCEQ must have the needed staff and monitoring equipment.

>The state should consider using state and federal funds to create a system of methane continuous emission sensors to help locate fugitive emissions, including super-producer events. Those sensors could also help industry locate those emissions and then have up to 14 days to fix the issue.

>The TCEQ should create a Methane State Action Plan with specific measurable and enforceable industry standards - not just because it is a federal environmental requirement, but because unhealthy air is a real threat to Texans' public health today. The use of advanced monitoring technology, both ground-based and satellite-based, that can provide realtime, ongoing data must be included in a serious plan to reduce (unlawful) methane releases.

The Texas Emissions Reduction Plan already provides funding for technologies that reduce methane emissions and limit flaring. A strong Methane State Action Plan presents the needed vehicle to combine requirements and incentives to realistically cut methane emissions ... for the health of our North Texas communities and for the health of all Americans.