

Matthew Mire

Dear TCEQ,

My name is Matthew Mire, I live in Blanco, TX, and I am a constituent of Senator Donna Campbell, SD25 and Representative Ellen Troxclair, HD19. I am also a volunteer with the non-partisan non-profit organization Citizens Climate Lobby, as well as the partisan non-profit organization RepublicEn. Thank you for this opportunity to submit comments regarding proposed rule project number 2024-027-113-AI.

I strongly support implementing the EPA's methane reduction directive to its fullest extent, ensuring strict compliance with 40 CFR Part 60, Subpart OOOOc. Methane is a potent greenhouse gas, and cutting emissions is critical to addressing human caused climate change. I urge TCEQ to adopt ambitious and transparent standards that prioritize environmental health, protect vulnerable communities near oil and gas facilities, and align with Texas's responsibility to combat climate change.

"Today in Tarrant County, which includes Arlington, more than 1 million people live within one half mile of a gas well, according to data from the local environmental group Liveable Arlington. The group's organizers say that oil and gas air pollution disproportionately impacts many low-income communities." [Ref 5]

"(For years) we've been getting complaints from neighborhoods about smells, odors, headaches, sickness and what to do about it," said Ranjana Bhandari, founder and executive director of Liveable Arlington. "Often we don't have a remedy." [Ref 5]

"Methane, a primary component of natural gas, accounts for about 16% of global emissions. Because methane lasts in the atmosphere for a few decades rather than a few centuries, reducing emissions would help moderate global temperatures more quickly." [Ref 5]

"The Permian Basin generates 1.4 million metric tons of methane each year — enough gas to meet the annual gas needs of nearly 2 million homes, according to the Environmental Defense Fund." [Ref 5]

"Currently, Texas doesn't have a rule to capture escaping methane emissions from energy infrastructure. The state's implementation of the EPA rule could change that." [Ref 5]

"A major component of the proposed state rule is tackling leaks from equipment failures, which are the largest source of methane pollution from oil and gas operations." [Ref 5]

"Operators will be tasked with inspecting their sites for leaks using handheld gas-imaging cameras or other technologies, which need to be approved by the EPA, to identify what equipment needs to be repaired or replaced. Gas wells will also need to be monitored for leaks until they are closed and plugged." [Ref 5]

"In Texas, state law says companies aren't supposed to flare or vent gas without special permission from the Texas Railroad Commission, which regulates the oil and gas industry. In 2022, the agency approved about 3,660 venting and flaring requests from oil and gas operators, according to agency data. Last year's numbers are not available on the agency's website." [Ref 5]

"The EPA estimates implementation of the rule would eliminate 58 million tons of methane emissions nationally by 2038, as well as 16 million tons of smog-forming volatile organic compounds and nearly 590,000 tons of toxins like cancer-causing benzene." [Ref 5]

"Strong rules are great, but they need to be properly and adequately enforced to deliver their promises," said

Elizabeth Lieberknecht, a regulatory and legislative manager at the Environmental Defense Fund."[Ref 5]

"I could see states like Texas essentially not doing any enforcement," Lyon said. "In an ideal world EPA would get Texas in trouble, but I think with Trump they might not do anything and allow Texas to not enforce."[Ref 5]

We wouldn't need EPA and state regulation of this sort if we allowed a national carbon price, dividend, and border adjustment. The market forces would eliminate the need for government regulation. There is a cost to pollution. I would not be allowed to dump my garbage in the street. I would be fined for that. If we continue to let air pollution be free, industries will pollute. It makes good business sense. If we price pollution, market forces can account for the cost of pollution and address it voluntarily without the need for further government micro management or intervention into the private and business sector.

I am an independent who has proudly voted for Chip Roy and Ellen Troxclair, and I care about clean air. I would prefer free market policies to address clean air. In absence of support for such free market policies, I support this regulation.

Sincerely,

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References:

[1] 2024 update of The Assessment of Historic and Future Trends of Extreme Weather in Texas 1900 - 2036 by Texas State Climatologist, John Nielson-Gammon, Texas A&M

https://texas2036.org/wp-content/uploads/2023/06/2024_ClimateReport.pdf

[2] NOAA graph shows the increase in billion dollar disaster events in our state.

<https://www.ncei.noaa.gov/access/billions/time-series/TX/cost>

Additional related references:

[3] Texas Energy and Climate Caucus

<https://www.texasclimatecaucus.com/>

[4] PowerHouse Texas

<https://powerhousetexas.org/>

[5] Growing oil industry support for methane reduction rule could help it survive Trump's return

<https://www.nbcdfw.com/news/local/texas-news/epa-methane-reduction-rule-implemented-in-texas/3721543/>