

Spencer Dickinson

I urge the TCEQ to create a serious and enforceable plan to limit the release of methane from active, inactive and future gas and oil wells. I live in Tarrant County where the air quality is now the worst in the State based on Ozone metrics.

Specific points to note:

- o There are over 7,000 drilled wells in Tarrant County; with over 4,300 current gas wells active.
- o 1 million people in Tarrant County (alone) live less than ½ mile from a gas well, the second largest county for urban fracking in the U.S.
- o The documented count of drilled wells in the 17 counties in which our GFWSC members reside is in excess of 175,000 active and inactive gas and oil wells.
- o Any and all standards put forward in a Methane Plan need to be applicable to both active and inactive wells given that leaks and emissions are known to occur from inactive well sites in addition to active wells.

As you know, methane is a component of the pollutant ground ozone which when exceeding certain levels results in a health risk to people (and other living beings) who breathe.

Historical "Ozone Action Days" (alerts issued for unhealthy air quality) for DFW as measured by TCEQ achieved at or near 60 days in 2022 and 2023. 60 ozone alert days, which is two full months out of the year, exceeds the counts in the previous two years by more than double, and also exceeded the number of days in the Houston area (the region most associated with Oil & Gas industry) in 2022/3 for the first time on record.

This means that the Dallas/Fort Worth area now has the worst air quality in our state (per this measure).

Oil and gas production is one of the largest sources of methane in our atmosphere. Leaks, outdated equipment, faulty valves, accidents, and illegal venting all release massive amounts of methane. Cutting these emissions would improve public health by limiting "volatile organic compounds" and other air pollutants that contribute to the increasing unhealthy Ozone alert days as well as reduce climate risks to all Texans.

Recent satellite data shows that Texas's Permian Basin emits twice the methane of New Mexico's regulated industry. Unfortunately, neither the Texas Railroad Commission nor the TCEQ has implemented regulations to curb emissions in our State.

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.