Glen Van Slyke

My name is Glen Van Slyke, I am an attorney by profession, and I have been a resident of Houston, Texas since 1967. I live in central Houston, and my family and the Harris County community are harmed by the greenhouse gas pollution from both oil and gas industry sources. ExxonMobil Baytown leads Harris County in greenhouse gas emissions, with significant releases of Carbon dioxide and Nitrous oxide. The largest 4 methane polluters in Harris County's oil and gas industry are ExxonMobil Baytown, Houston Refining, ChevronPhillips Chemical, and Shell Deer Park Chemical, according to the EPA FLIGHT reports they filed from 2018 to 2022.

Both carbon dioxide(CO2) and methane(CH4) are greenhouse gases that trap heat in the lower atmosphere. Methane's lifetime in the atmosphere is much shorter than that of carbon dioxide (CO2),but CH4 is more efficient at trapping radiation than CO2. Methane is a potent greenhouse gas with more than 80 times the warming power than carbon dioxide over twenty years. Methane pollution is fueling climate change and extreme weather in Texas, from Winter Storm Uri to Hurricane Beryl.

The TCEQ has the authority to implement methane rules that will protect Texans and future generations, and should design a state plan that is at least as protective as the EPA standards. 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.

• 5.3 million Texans live within a half mile threat radius of an oil and gas site. Oil and gas air pollution disproportionately impacts many historically marginalized or vulnerable communities; living near oil and gas wells is associated with higher risk of cardiovascular disease, impaired lung function, anxiety, depression, preterm birth and impaired fetal growth.

• TCEQ rulemaking and state plan

- 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.
- o TCEQ should at a minimum adopt the EPA model rule.
- o 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.

o 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.