

# Chester Bullard

Proposed rule project number 2024-027-113-AI

Dear TCEQ,

My name is Chester Bullard, and I reside in San Antonio, Texas. I work for Howard Energy Partners where our company delivers positive energy through our pipelines and the communities where we live and work. We are part of the industry that powers every other industry. We provide clean, reliable energy that fuels communities and businesses across the U.S. and Mexico and improves people's quality of life.

I am writing to express our strong opposition to the proposed methane regulation plan under the Section 111 methane rule, which would harm Texas communities and the energy sector. As an oil and gas operator for the past 13 years, Howard Energy Partners has always been vigilant in operating in an efficient and environmentally safe manner in Texas, Oklahoma, Pennsylvania, and New Mexico.

The proposed rule will make life more expensive for every Texan. Environmental standards should only be adopted when their benefits outweigh their costs. This implementation of Section 111 fails that test, imposing substantial costs for minimal benefits. The cost to comply and install required equipment to bring older sites into compliance with the new OOOOc regulations will severely impact the profitability of most of the oil and gas sites in Texas. When the cost of compliance outweighs profit then jobs will be eliminated, and the energy industry will begin to diminish. The new OOOOc regulations will cause an immediate waste of valuable natural resources on which our communities, state and nation rely on.

TCEQ should pause the state implementation plan and urge the incoming administration's EPA to reevaluate the methane rule using proper cost-benefit analysis.

Sincerely,

Chester Bullard

Vice President Operations & EHS