

Michael Parsons

TECQ Regulators

Thank you for allowing me this opportunity to make comments regarding the proposed state of Texas regulations for compliance of OOOOc regulations as purposed by the EPA.

As a small independent oil and gas operator for the past 40 years, we have always been vigilant in producing and operating in an efficient and environmentally safe manner in Texas, Oklahoma, Wyoming, Alabama, and New Mexico. The vast majority of our 584 wells are located on private lands. Lands in which the owners are stewards of the land that represents, for most of them, their most valuable asset. We also own and operate wells located on lands managed by the State of Teas, New Mexico, the Bureau of Land Management, and the Corps of Engineers. We also are multi-generational landowners that take seriously the responsibility of stewardship.

During those 40 years, our company has had many rules and regulations imposed on our industry. WE have found a way to comply, despite the very fact that the rules and regulations were mostly imposed by regulators that have no knowledge or experience in the energy extraction business and or were imposed for at best unwarranted and at worse nefarious political purposes. At all instances, those rules and regulations were mandated upon companies such as ours as well as multination organizations. A well producing 1 barrel of oil or a well producing 10,000 barrels of oil were placed into the same regulatory basket.

For that 40 year period, small independent producers found a way to comply with the rules and regulations. Sometimes at the expense of jobs, sometimes at the expense of premature abandonment of wells, and at various times with exceptions from proposed rules due to the minimal impact that these small independent operators had on the success or failure of the proposed regulations and the importance of independent energy producers that most knowledgeable experts assert.

Without independent energy producers there would have been no discovery of the Ranger Field that is attributed to winning WW1, the discovery of the East Texas Field that powered the Allied Forces to victory in WW11, and certainly there would have been no "Shale Revolution" without the tenacity and forceful execution of technology of independent energy producers.

However, in the 40 years we have been in this industry, I have never seen a rule that threatens the very viability of independent energy producers and is certain to result in the loss of the innovation engine that has powered the USA to the position of the leader of the free world.

We agree that methane emissions should be reduced on a worldwide basis. We also agree that there is great debate on how those emissions should be reduced and who should bear the cost and sacrifice. But what we do not agree with is that the testing and compliance of the 525 wells our company owns, which emit minimum methane emission, should have the same testing and compliance cost as a major oil company whose single horizontal well pad in the Permian Basin, emits in one day more methane than the 525 wells we own and operate emit in 10 years.

The cost to test and place into service the equipment necessary to maintain compliance will severely impact the profitability of most of our current wells. Jobs will be eliminated, innovation will be stymied, and reserves of oil and gas will be lost.

Under Texas state law, you are required to follow the mandate of Texas Government Code., {2006.002{ Adoption of Rules with Adverse Economic Effect. You are required to complete an economic impact statement and a regulatory flexibility analysis as required by the law. Once you have undertaken this mandate it will become obvious that a exemption from this rule is warranted due to detrimental impact on small business in Texas.

Common sense exceptions to unnecessary rules mandated from Washington DC have been well documented in the past in the state of Texas. I urge you to follow that commonsense approach in this matter.