Tyler Rufenacht

There is no way for small oil and gas operators to comply with OOOOc. Not only will OOOOc bankrupt small operators, but it will leave states with TENS of THOUSANDS of wells to plug. We are talking about BILLIONS in assets wiped out; assets that will no longer contribute to federal, state and local taxes. The "Marginal Wells" that these small companies operate account for approximately 10% of the total oil and gas production in the United States. By definition, these wells are marginally economic, but just enough collectively to employ tens of thousands of workers across the country and provide a good living to the families that own the companies. Specifically, the LDAR requirements, Pneumatic Pump and Controller requirements, and Liquids Unloading requirements will be the end of small operators as we cannot afford any more expenses on our production facilities. We all want clean air, but the so called "Benefit" that OOOOc provides is simply not worth it.