

Denzil West

Dear TCEQ,

My name is Denzil West, and I reside in Midland, Texas. I have over 40 years in the upstream oil and gas industry and currently serve as CEO of Admiral Permian Operating, a small privately owned company operating numerous oil and gas properties in West Texas. We currently provide jobs to over 100 families in Texas and live in the middle of our oil and gas production. We have extensive programs currently to insure minimal methane emissions and clean air for our selves, our children and grandchildren to breath.

I am writing to express my strong opposition to the proposed methane regulation plan under the Section 111 methane rule, which would harm Texas communities and our energy future.

Environmental standards should only be adopted when their benefits outweigh their costs. This implementation of Section 111 fails that test, imposing massive costs for minimal benefits.

The proposed rule will make life more expensive for every Texan.

The compliance burdens of this rule—including mandatory leak detection, extensive documentation, equipment upgrades, and vapor recovery units (VRUs)—will devastate oil and gas producers, especially small operators with thin margins. Since energy is the industry that powers every other industry, raising costs for Texas energy producers makes life more expensive for every Texan.

The proposed rule punishes Texas without reducing global emissions.

According to EPA's records, the methane emissions from Texan natural gas and petroleum systems have significantly declined both from 1990s levels and their peak around 2014, despite increasing production of in-state oil and gas. Today, Texan natural gas and petroleum systems contribute to less than 1% of global methane emissions. Thus this stringent rule would unfairly punish Texas oil and gas producers while barely affecting global methane emissions.

The proposed rule will make every Texan less, not more, safe from climate.

The key to climate resilience is not slightly cooler temperatures but reliable, affordable energy to power machines like A/C, heating, crop transport, and storm warning systems. Thanks to fossil fuels, climate-related disaster deaths have dropped 98% over the last century as temperatures have risen. By burdening producers of affordable, reliable energy, this rule threatens Texas's ability to respond to climate risks.

Instead of adopting these disastrous standards, 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,

Denzil R. West

CEO-Admiral Permian Operating LLC

200 N Loraine, Suite 800

Midland, TX 79701

432-653-0241