

Elizabeth Lieberknecht

Attached, please find Environmental Defense Fund's comments on the proposed revision/renewal.

March 31, 2025

*Via electronic filing*

Re: Proposed Renewal and Revision of Oil and Gas General Operating Permits Numbers 511, 512, 513, and 514; Non-Rule Project Number 2024-021-OTH-NR

Dear Ms. Ricco and Ms. Heath,

Thank you for accepting these comments submitted by Environmental Defense Fund (“EDF”). A nonprofit organization with over 3 million members worldwide and over 120,000 members in Texas, EDF is deeply concerned about the pollution emitted from oil and natural gas development and operations. EDF brings a strong commitment to sound science, collaboration, and market-based solutions to our most pressing environmental and public health challenges. Through research and advocacy, EDF has been driving action to cut methane pollution for over a decade.

On March 8, 2024, EPA finalized New Source Performance Standards (“OOOOb”) and Emissions Guidelines (“OOOOc”) to address methane and other harmful pollution from new and existing oil and gas operations, respectively. EDF appreciates TCEQ’s ongoing efforts to implement OOOOb and OOOOc, including the proposed revisions to Oil and Gas General Operating Permits (“GOPs”) under Title V to incorporate OOOOb applicable requirements.

Specifically regarding these actions, EDF appreciates and supports the Executive Director’s proposed revisions to GOPs No. 511, 512, 513, and 514 to reflect the changes to federal rules made by OOOOb. These revisions will provide clarity and certainty to regulated entities subject to OOOOb and facilitate efforts by impacted communities and other stakeholders to assess compliance and emissions reductions. We encourage the TCEQ to swiftly adopt the proposed revisions and renewal of the GOPs and continue with efforts to implement OOOOb and OOOOc more broadly.

Respectfully submitted,

Elizabeth Lieberknecht

Regulatory & Legislative Manager, Environmental Defense Fund