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Subject: The Form "Rules Comment Form" was submitted
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General Comment

Here is a new comment from the Web.

Comment

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Amend §3.8 and new/amended Chapter 4, waste management

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Comments concerning proposed rulemakings

Dear Chairman Craddick, Commissioner Christian, and Commissioner Wright, I am writing to share my concerns about the recent updates to Statewide Rule 8, as detailed in the final draft from August 15, 2024. The changes seem to reduce critical environmental protections, particularly related to groundwater and landowner rights. The removal of important standards from the October 2023 draft, such as those for pit construction, operation, closure, and groundwater monitoring, is concerning. These revisions could leave Texas lands and water more exposed to potential contamination. I kindly suggest the Railroad Commission of Texas revisit these updates and consider strengthening regulations in the following areas: Uniform Standards for Authorized Pits: It would be beneficial to have clear and consistent requirements for the construction, operation, and closure of all authorized pits. The new registration process is a step forward, but additional measures like proper construction standards, liners, groundwater monitoring, and pre-closure waste testing are essential for environmental protection. Landowner Notification and Consent: Requiring operators to notify and obtain landowner consent before permanently burying waste on their property would be a positive step. The potential risks from buried waste necessitate full transparency and landowner involvement. Ensuring robust regulations will not only protect our environment but also help the Texas oil and gas industry maintain its social license to operate by demonstrating a commitment to responsible practices. Thank you for your attention to these important matters.

Respectfully, Zach Liu

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