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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

As a concerned geologist that has worked on many projects in Texas over the years, I've been closely following the updates to Statewide Rule 8. The final draft issued on August 15, 2024, raises serious concerns about environmental protection, groundwater safety, community health, and landowner rights. The latest draft significantly lowers standards for protecting groundwater and the environment and removes previous requirements for pit construction, operation, closure, and groundwater monitoring. I urge the Railroad Commission of Texas to revisit the updates and strengthen regulations in two key areas: Uniform Standards for Authorized Pits: The new draft lacks specific construction, operation, and closure requirements for authorized pits. To safeguard groundwater and land, we need clear standards for pit construction, liners, groundwater monitoring, and waste testing before closure. Landowner Notification and Consent: Operators should be required to inform and obtain consent from landowners before permanently burying waste. The waste in these pits, including harmful substances like benzene and arsenic, poses risks to vegetation, groundwater, and wildlife. Similar consent requirements for landfarming should apply to pit burial. While reserve pits are smaller than commercial disposal pits, they pose similar risks to groundwater and remain largely unregulated. Stronger regulations will protect our environment and support Texas's energy industry responsibly.

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Origin

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