

From: paige.powell@everyactioncustom.com on behalf of [Paige Powell](#)
To: [Rules Coordinator](#)
Subject: Re: Comments on "Amend 3.8 and new/amended Chapter 4 waste management"
Date: Tuesday, October 15, 2024 3:34:01 PM

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Dear Rules Coordinator,

Given the ongoing produced water disposal crisis, which has led to unprecedented induced seismicity and legacy well blowouts in recent months, strong waste pit rules are more important than ever.

If oilfield waste can't be disposed of properly through a well-managed underground injection control program, we must ensure that it can be disposed of safely in lined waste pits which are thoughtfully sited to protect both our Texas communities and drinking water resources.

With the expansion of carbon sequestration in Texas, and the presumption that subsurface carbon dioxide plumes can be managed through produced water extraction, the safe disposal of oilfield waste in well-regulated disposal sites is necessary for responsible carbon management.

As you are well aware, these waste pit rules are relevant to so many different facets of oil and gas development; so I urge you to please heed Commission Shift's recommendations for stronger revisions to statewide rule 8.

Thank you for your consideration.

Sincerely,
Ms. Paige Powell
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