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General Comment

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Amend §3.65, Critical Designation of Natural Gas Infrastructure

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Comments concerning proposed rulemakings

The oil lease casinghead gas rate is a meaningless designation for definition of Critical Gas Supplier. Leases with many legacy producer wells will not be capable of producing gas in the "energy emergency" event around which this rule was written, i.e., Winter Storm Uri. Imagine 60 wells making 20 MCFD each on a lease with above grade flowlines. It is cost prohibitive to bury the flowlines, and the wellheads will freeze regardless, shutting off both gas and oil production from the wells. This criteria, besides being physically meaningless, also results in prohibiting contracts between oil well operators and energy suppliers for shutting in operations that would be infeasible in such environmental conditions. These contracts are beneficial to the public, prioritizing energy toward civilian operations, as well as the energy company, which is compromised by the extreme demand, and the oil producer, as the oil producer cannot operate anyway. The operator also benefits from a lower energy cost overall in agreeing to such shut-in conditions, which extends the livelihood of the smallest oil well producers and extends the state's oil and gas reserves. The biggest concern regarding this legislation, however, is that it does not address the preferential treatment given to renewable energy providers, since this power is prioritized over other reliable forms of power by the state. Punishing small oil and gas operators for the state's gross mismanagement of energy generation will only exacerbate the current Texas energy crisis.

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