

From: [rcwebcontact](#)
To: [Rules Coordinator](#)
Subject: The Form "Rules Comment Form" was submitted
Date: Thursday, October 10, 2024 11:11:20 AM



General Comment

Here is a new comment from the Web.

Comment

Choose Form

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

Name

Tim Tarpley

Address

2500 Citywest Blvd., Suite 1110

City

Houston

State

TX

Zip

77042

Business Phone, Fax

Email Confidentiality Preference

No, I request my e-mail address to remain confidential

Email Address

[REDACTED]

Comments concerning proposed rulemakings

To the Texas Railroad Commission: The Energy Workforce & Technology Council is the national trade association for energy services and technology companies. Energy Workforce represents over 200 companies, many of which are headquartered or have major operations in the State of Texas. I write to you today regarding the current regulatory environment surrounding drilling waste management in Texas. Thanks to great innovation and technological strides, the oil and gas industry has successfully minimized the environmental impacts of its E&P activities across the globe. Many of our members are implementing Best Management Practices (BMPs) that go above and beyond existing regulatory requirements in all geographies where they operate. However, we believe the Texas regulations governing the management of oil and gas waste can be improved in order to align with national and international standards for environmental and groundwater protection. In many regions of the United States and the world, regulators have implemented BMPs that emphasize no uncontrolled releases of drilling waste, using closed-loop drilling systems, and minimizing the environmental footprint of oil and gas operations. Similarly, practices such as groundwater protection through baseline sampling and advanced waste management systems are industry standards in regions beyond Texas and should be included in the currently proposed Texas regulations. This not only aligns the state with best practices but protects it from further federal regulations. While oil and gas operators in Texas are renowned for their expertise in hydrocarbon extraction, the management of drilling waste requires specialized knowledge that primarily resides with the oilfield service companies, rather than operators. These companies have dedicated resources and advanced technologies designed specifically for the treatment,

recycling, and disposal of oilfield waste. The operators' core mission is hydrocarbon production, whereas service companies have decades of experience, and much greater bonding levels, ensuring that waste is managed in an environmentally responsible manner. As the sector continues to evolve, Texas regulations must reflect these advancements and allow service companies to implement industry-leading practices. We urge the Railroad Commission to reconsider the current draft rules to modernize them in a way that reflects the higher standards currently recognized and utilized by regional, national and international trade groups. This will ensure that Texas continues to lead the way in responsible energy production while also safeguarding our natural resources and reducing long-term liabilities for operators. Modernization efforts must include stronger environmental protections, including stricter rules for waste pits, mandatory landowner notification and consent, groundwater monitoring, and greater reliance on closed-loop systems, which have already demonstrated both environmental and cost-saving benefits. Thank you for considering these points. We remain committed to working with the Railroad Commission and all stakeholders to ensure that Texas maintains its leadership in the oil and gas sector while upholding the highest environmental standards. Sincerely, Tim Tarpley President, Energy Workforce and Technology Council

check

Origin

38.104.63.234