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General Comment

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

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Comments concerning proposed rulemakings

Honestly, I'm embarrassed of the latest draft of proposed changes to statewide Rule 8 as a Texan, a parent, and life-long supporter of the oil & gas industry. As a petroleum engineer and proud Texas A&M graduate, I spent 17 years working in upstream oil & gas. It is unconscionable to me that the cost for properly disposing of drilling waste would make the operation uneconomic. There are many reasons oil & gas development may or may not be viable and proper waste management isn't one of them. Any operator claiming that they can't run their business economically without properly securing and disposing of waste to 21st century standards shouldn't be in business. The health and environmental consequences are too great. At a minimum, I urge the commission to make the following changes: 1. Reserve pits and mud circulation pits should be moved from "Schedule A Authorized Pits" to "Schedule B Authorized Pits," which have more reasonable construction standards protective of groundwater and soil. 2. Operators should be required to close pits using reasonable standards that ensure protection of the environment and groundwater. This should include groundwater monitoring for up to 5 years after pits have been closed. 3. Operators should be required to notify and obtain a landowner's permission before permanently burying waste on their land. By the way, the younger generations are not going to tolerate such environmental apathy. My oldest daughter is a junior engineering major in college and among her cohort, sustainable practices are part of their moral code. Good luck changing their minds. The immediate risks are enough to take action; however, the longer term impacts shouldn't be ignored either. We need smart, young people to deliver affordable, sustainable energy to the world, and Texas, in

particular, plays a critical role. The next generation of talent won't be interested if it means going against their core life principles.

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