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November 11, 2024

Rules Coordinator
Office of General Counsel
Railroad Commission of Texas

Submitted electronically to rulescoordinator@rrc.texas.gov

Re: Comments Regarding Proposed Amendments to:
TITLE 16. ECONOMIC REGULATION
PART 1. RAILROAD COMMISSION OF TEXAS
CHAPTER 6. GEOTHERMAL RESOURCES
SUBCHAPTER A. SHALLOW CLOSED-LOOP GEOTHERMAL SYSTEMS
16 TAC §§6.101 - 6.112

On behalf of the Texas Geothermal Energy Alliance ["TxGEA"], I am pleased to present these comments regarding the above-referenced rules. TxGEA is grateful to the Commission for the opportunity to provide comments. We appreciate the hard work of the staff and the Commissioners for their efforts in developing these new rules and for taking this significant step forward in the oversight, development, and regulation of the emerging geothermal energy industry.

TXGEA is a Texas-based, Texas-led advocacy organization created for the purpose of advancing geothermal energy in Texas. TxGEA is comprised of a broad and interdisciplinary group of entities engaged in geothermal resource exploration, well drilling, plant construction, resource production, and energy markets. Our membership includes multi-national and independent oil and gas companies, oilfield service companies, utilities, start-up companies working to advance geothermal technologies, including large-scale baseload dispatchable electricity production and energy storage, as well as leading scientists and engineers from a number of academic institutions across Texas. Accordingly, our membership has a keen interest in the proposed rules.

The Texas energy sector benefits tremendously from a diversified energy portfolio that includes oil, natural gas, coal, wind, solar, hydro, and nuclear power. In addition to these resources, Texas also is fortunate to have a tremendous amount of undeveloped geothermal energy resources. Our members are bringing to market new and advanced technologies to produce reliable and sustainable baseload electricity, to solve the problem of intermittency related to solar and wind by storing energy in the earth, and to utilize shallow geothermal resources for sustainable residential, commercial, and industrial heating and cooling. These rules are the first step in the development of

sustainable geothermal energy related to residential, commercial, and industrial heating and cooling. We look forward to working with the Commission in the future as you develop additional rules regarding the oversight, development, and regulation of sustainable baseload generation and storage of geothermal energy.

Our membership has carefully followed the development of the above-referenced rules and we have carefully read and reviewed them. We are pleased to inform you that we support the proposed rules as drafted without any recommendations for amendments.

Thank you for the prudent and competent exercise of your jurisdiction in the important and developing field of geothermal energy.

Sincerely,

Benjamin W. Sebree
General Counsel
Texas Geothermal Energy Alliance