

TEXAS
METHANE & FLARING
COALITION

February 14, 2024

Kasey Savanich
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

Dear Ms. Savanich,

The Texas Methane & Flaring Coalition (the Coalition) is a voluntary coalition of Texas oil and natural gas trade associations and more than 40 Texas energy companies. Texas operators are always proactive in investment and innovation and they are committed to working collaboratively to develop our state's natural resources while improving environmental performance. To better assess the issues of methane emissions and flaring and develop industry-led solutions, a voluntary coalition of companies and organizations have joined together to form the Texas Methane and Flaring Coalition. The Coalition works to collectively identify and promote operational and environmental recommended practices to minimize flaring and methane emissions.

After reviewing the proposed Climate Pollution Reduction Grant (CPRG) Priority Action Plan (PAP) measures for Texas, the Coalition would like to voice its support for the proposed plan, specifically with respect to:

- electrification of field assets that will yield large and scalable results;
- engine, equipment, and facility replacement and retirements that increase efficiency and reduce emissions; and
- a variety of improved monitoring technologies that allow operators to detect and isolate emissions and repair or replace failing equipment.

Our members' efforts have already demonstrated value and with additional support from the Climate Pollution Reduction Grants, our members feel they can increase the adoption of technologies and accelerate further emissions reductions.

In the December 2023 "RRC Year in Review" report published by the Railroad Commission of Texas, data shows a continued decline in flaring. The report details that "the flaring rate in Texas has dropped significantly, by 61 percent, since June 2019. For the most recent month that data is available, September 2023, the flaring rate was less than 1 percent, meaning more than 99 percent of gas produced in Texas was being beneficially used."¹

Texans for Natural Gas (TNG) released a new report highlighting the oil and natural gas industry's continued strong progress in reducing emissions. Flaring intensity in the Permian Basin decreased by 4.5 percent from 2021 to 2022 and by nearly 66 percent since the Basin experienced record

¹ <https://texasmethaneflaringcoalition.org/rrc-data-shows-continued-drop-of-flaring-in-texas/>

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flaring in 2019. Texas, where roughly 70 percent of Permian production occurs, has also seen significant decreases in flaring intensity: nearly 8 percent from 2021 to 2022 and nearly 60 percent since 2019.²

According to the national organization, The Environmental Partnership, a voluntary group of U.S. oil and natural gas companies committed to continuously improving the industry's environmental performance, operators across the nation and right here in Texas are making significant progress and investments in leak detection, repair programs, replacing pneumatic controllers and more.³

Technology is key in combatting emissions and the Coalition promotes a variety of opportunities for members to learn about types of technologies through the annual Energy Elevated Technology Showcase—an event that pairs emerging technologies and industry to discover how cutting-edge innovations are changing the way we produce oil and natural gas in Texas.

The Coalition appreciates the work of TCEQ to host workshops that encourage industry participation, develop a CPRG PAP that considers the broadest measures, and the implementation of specific concepts that yield the most beneficial emissions reductions for Texans.

Sincerely,

The Members of the Texas Methane & Flaring Coalition

² <https://texasmethane-flaring-coalition.org/permian-basin-producers-close-out-2023-with-continued-strong-progress-in-reducing-emissions/>

³ <https://texasmethane-flaring-coalition.org/environmental-partnerships-2023-annual-report-shows-accelerated-progress-in-emissions-reductions-in-oil-and-natural-gas-industry/>