



June 30, 2022

The Hon. Wayne Christian
Texas Railroad Commission
Chairman
Texas Railroad Commission
P.O. Box 12967
Austin, Texas 78711

The Hon. Christi Craddick
Texas Railroad Commissioner
Texas Railroad Commission
P.O. Box 12967
Austin, Texas 78711

The Hon. Jim Wright
Texas Railroad Commissioner
Texas Railroad Commission
P.O. Box 12967
Austin, Texas 78711

RE: Comments on Class VI Wells Primacy

Dear Commissioners Christian, Craddick, and Wright,

On behalf of the Greater Houston Partnership, representing the business community of the 12-county greater Houston region, I want to emphatically signal our support of the efforts of the Texas Railroad Commission (RRC) to establish Class VI well injection primacy so as to improve the development of lower-carbon technologies and expand carbon capture and storage (CCS) deployment in our state.

The Texas energy industry is advancing rapidly and developing lower-carbon technologies like CCS. Ensuring Texas has the proper regulatory framework is crucial to implementing this lower-carbon infrastructure.

Today, businesses in our state face a regulatory process requiring them to work across multiple state and federal regulatory bodies. This creates significant delays and increases costs in the development and implementation of large-scale CCS infrastructure, including CCS hubs such as the \$100 billion investment currently proposed in the Houston region.

If Texas is to remain a global leader in CCS advancements, we must pursue regulatory policies and procedures to streamline the permitting process. By allowing the RRC to have sole regulatory authority and primary jurisdiction over Class VI wells, we create a stronger regulatory pathway to achieving the development of large-scale CCS investments and help advance our state's enviable position as the Energy Capital of the World.

Thank you,

A handwritten signature in blue ink that reads 'Bob Harvey' in a cursive script.

Bob Harvey
President & CEO