

**From:** [Wynn B. Baker](#)  
**To:** [Kellie Martinec](#)  
**Subject:** FW: RRC Rule 8  
**Date:** Wednesday, October 2, 2024 1:44:50 PM

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**From:** Grant, Melissa <Melissa.Grant@siigroup.com>  
**Sent:** Wednesday, October 2, 2024 1:19 PM  
**To:** Christi Craddick <Christi.Craddick@rrc.texas.gov>  
**Subject:** RRC Rule 8

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Dear Chairman,

As a member of the Texas chemicals and materials industry, I follow developments that concern our state's ability to sustain and grow a robust oil and gas industry. You may be aware that  $\frac{1}{3}$  to  $\frac{1}{2}$  of the oil and natural gas produced in Texas is utilized by the chemical industry as feedstock for the essential products we create.

Safe and responsible operations at production sites help maintain steady and reliable supplies to manufacturers like the one I work for. Sound practices also demonstrate to our customers, many of whom are under pressure to reduce their reliance on fossil-fuel based products, that energy production in Texas is at the forefront of safety, preservation of the environment, and protection of those who live near drilling sites.

I have been following with great interest the proposed updates to Statewide Rule 8. The final draft, issued on August 15, 2024, raises concerns about the environmental protection of Texas lands, groundwater and community health, as well as risks to the industry and landowners presented by outdated oilfield waste management practices.

In the newly proposed regulations, the standards to protect groundwater and the environment have been significantly lowered. The previous draft issued in October 2023 included standards for authorized pits on construction, operation, and closure. Alarming, those were removed in the most recent draft, as were requirements for groundwater monitoring, sampling, and liners.

Oil and gas production waste can contain high concentrations of benzene, chlorides, naturally occurring radioactive material, metals and diesel fuel. These chemicals and materials should

be managed closely to reduce the risks they can pose if not handled properly. We should leverage modern technology and systems wherever possible to mitigate the risks that energy production waste can present.

I respectfully ask the Railroad Commission of Texas to reconsider the proposed amendments to Statewide Rule 8. I believe it is in the state's best interest to move forward with the original proposed rules included in the October 2023 draft and to establish uniform requirements for construction, operation, and closure standards of all authorized pits. Reasonable construction standards, liner requirements, groundwater monitoring, pre-closure testing of waste, and closure standards are the best ways to protect groundwater, land and community health while also demonstrating the commitment of the Texas energy industry and regulators to high standards of safety and responsibility.

As a concerned Texan, it is my belief that reasonable regulations for authorized pits will protect our groundwater and the environment while still allowing Texas' thriving energy industry to lead from the front. I kindly urge you to consider strengthening the regulations as outlined above.

Respectfully,

Melissa Grant  
Sealy, Texas

[Redacted Signature]

**Melissa Grant**

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