

January 8, 2021

Rules Coordinator  
Railroad Commission of Texas  
Office of General Counsel  
P.O. Drawer 12967  
Austin, TX 78711-2967

**RE: Revisions to the instructions to Form PR Monthly Production Report**

Dear Rules Coordinator:

The Texas Methane & Flaring Coalition (Coalition) would like to submit comments regarding the Revisions to the instructions to Form PR Monthly Production Report.

The Coalition was established in December 2019 and includes seven trade associations and 40 Texas operators. The Coalition was formed voluntarily to assess the issues of methane emissions and flaring to develop industry-led solutions.

The Coalition is committed to working collaboratively to continue developing our state's natural resources, while improving environmental performance. The Coalition is working to collectively identify and promote operational and environmental recommended practices to minimize flaring and methane emissions.

The Coalition is dedicated to developing solutions, as we recognize the leadership role expected of the oil and natural gas industry in Texas. The industry anchors our economy by creating high-paying jobs and generating revenues unmatched by other industries in our state. Oil and natural gas contribute greatly to products and materials that we use every day, such as medicines, computers, life-saving devices, plastics, and much more.

The Coalition commends the Railroad Commission (Commission) on the changes it has made to the PR Form Instructions. We appreciate the thoughtful and pragmatic approach and the opportunity to comment on this proposal.

We support the proposed change to discontinue use of Disposition Code 4 for gas vented or flared and replace it with two distinct disposition codes to differentiate between gas vented and gas flared and requiring remarks indicating which of four categories of release authorization applies to the volumes so reported. These changes will give the Commission significantly more detailed information with which to make regulatory and administrative recommendations and decisions and will give both the Commission and industry information that can be used to identify trends and opportunities for improvement of infrastructure.

This additional detail will be useful to both the Commission and stakeholders, and we support the effort and the way in which the Commission staff has chosen to design the changes. However, making these changes will require multiple adjustments for operators of every size. For example, many operators have reported to the Coalition that their automated

reporting systems, procedures, and applications would have to be adjusted and/or additional manual input into the reports may have to be done to incorporate the additional criteria of data inputs, administer data validation for those inputs, and monitor exceedances for those parameters based on the new requirements. For these reasons, we propose that the Commission provide industry sufficient time and flexibility for implementation. We propose the end of calendar year 2021 to implement these changes.

Members have raised important questions about how to ensure compliance and ask that the Commission provide guidance in submitting the Form PR, as well as direction in potentially correcting the authority codes for disposition codes 10 and 11. Additionally, we ask that if adjustments to the agency’s reporting requirements and processes are identified, that the Commission work with operators to administer these changes.

We appreciate the Commission’s consideration of these comments and the Coalition looks forward to providing additional information and assistance.

