

September 4, 2020

The Honorable Wayne Christian  
The Honorable Christi Craddick  
The Honorable Ryan Sitton  
Railroad Commission of Texas



Re: [Proposed amendment to Statewide Rule 32 Exception Data Sheet](#)

Dear Chairman Christian and Commissioners Craddick and Sitton:

Attached below is a list of over 200 constituents and Environment Texas members who would like you to adopt a formal policy resolution to end routine flaring by 2025. While your new proposal is a step in the right direction, reducing waste, air pollution, and climate emissions from flaring will require a concerted effort to reduce the overall number of flaring and venting permits issued by the Commission. We urge you to strengthen the changes laid out in the proposal by doing the following:

- Adopt a formal policy resolution to end routine flaring by 2025.
- Stop granting flaring permits except for health and safety reasons.
- End the practice of granting extensions to existing flaring permits, which turns temporary permits into long-term permits.
- Enforce existing permits on flaring. The RRC should issue fines to companies that violate their permits by engaging in excessive flaring, operating faulty flares, or venting gas. Fines should be high enough to more than offset any economic value a company may have earned from non-compliance with its permit.
- Improve monitoring of flaring and methane pollution so that regulators can understand the extent of the problem. If the RRC limits flaring, some companies may try to comply by venting instead, which isn't visible without special imaging equipment. This will make increased monitoring especially critical and thus the state should improve collection of flaring data and separate out information about flaring versus venting.

Below is the full-text of the [petition](#), including a list of the citizens who signed.

Thank you,  
Emma Pabst  
Global Warming Solutions Advocate, Environment Texas