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To: [Rules Coordinator](#)
Subject: The Form "Rules Comment Form" was submitted
Date: Friday, July 15, 2022 8:53:49 AM



General Comment

Here is a new comment from the Web.

Comment

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New §3.66, Weather Emergency Preparedness Standards

Name

Doreen Smithwick

Address

2318 Placid Dr.

City

Carrollton

State

TX

Zip

75007

Business Phone, Fax

9722429084

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Email Address

[REDACTED]

Comments concerning proposed rulemakings

The proposed rule's draft penalty structure is not strong enough. For example, the proposed violation classification system would call for a maximum penalty of no more than \$5,000 per violation even if an operator that produces the highest volumes of gas (> 5 million cubic feet per day) was deemed "reckless," created a potential hazard to public health, safety, or economic welfare, and made no effort to remedy the violation. According to Gas Technology Institute, winter weatherization for gas wells can cost anywhere from \$2,500 to just over \$30,000. Penalties that don't exceed \$5,000 might lead operators to risk the violations rather than paying to weatherize their equipment, leaving Texans at risk of more widespread blackouts.

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