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To: [Rules Coordinator](#)
Subject: Draft Rules Informal Comment
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General Comment

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3.8, 3.57 and Chapter 4

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Comments concerning draft rulemakings

The draft changes to Texas' oilfield waste disposal rules raise significant concerns, especially regarding their potential impact on the environment and the involvement of oil companies in crafting these rules. Here is a critical assessment of the key issues in the article:

Conflict of Interest: The most significant concern is the apparent conflict of interest involving Railroad Commissioner Jim Wright, who has investments in the oilfield waste industry. It is alarming that someone with financial ties to the industry is leading the effort to rewrite regulations governing that very industry. This raises questions about the impartiality and objectivity of the regulatory process.

Lack of Transparency: The article highlights that oilfield waste executives and consultants were involved in drafting the regulations two years before the public had a chance to see them. This lack of transparency undermines public trust and the democratic process. Regulatory changes of this magnitude should be subject to open and inclusive public input from the beginning.

Environmental Impact: The proposed rules are framed as necessary for efficiency and new waste recycling technologies. However, the concern is that they may prioritize industry interests over environmental protection. The public should be reassured that these changes prioritize the health and safety of Texas residents and ecosystems over industry profits.

Limited Public Input: The draft rules appear to limit who can protest permits and reduce the influence of environmental groups in stopping new waste pits from being built. This restriction on public input is a significant concern, as it may hinder the ability of communities to protect themselves from potential environmental harm.

Flexibility for Industry: Allowing companies to propose alternative recycling methods not covered by

the rules may sound progressive, but it also raises concerns about oversight. Without proper regulation and oversight, these new methods could lead to environmental harm. Lack of Penalties for Violations: The draft rules do not spell out penalties for violations adequately, leaving room for ambiguity and potentially allowing companies to avoid accountability for environmental harm. Industry Influence: The involvement of powerful oil and gas lobbying groups in reviewing and providing feedback on the rules raises suspicions about industry influence over the regulatory process. It's essential to ensure that regulatory decisions are made independently and prioritize the public interest. Campaign Donations: Commissioner Wright's receipt of campaign donations from the oilfield waste industry, including companies with a vested interest in these regulations, raises concerns about the influence of money in politics and regulatory decision-making. In summary, the draft changes to Texas' oilfield waste disposal rules raise significant concerns regarding transparency, environmental protection, and the potential for industry influence. It is crucial that the regulatory process prioritizes the well-being of Texas residents and the environment over industry interests and profits.

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