

**From:** [Susan Mulloy](#)  
**To:** [Rules Coordinator](#); [Christi Craddick](#); [Wayne Christian](#); [Jim Wright](#)  
**Subject:** Rule 8  
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To Commissioners Craddick, Wright and Christian,

As a lifelong Texan and resident of Friendswood, I am deeply invested in the well-being of our communities and the future of our environment. Growing up near the Brio Superfund site, I witnessed firsthand the devastating consequences of improper waste disposal—long-term health issues and cancer clusters have affected far too many families, including my own. These impacts serve as a harsh reminder of what can happen when we fail to protect our land and water.

It is with this personal history that I've been following the proposed updates to Statewide Rule 8, released on August 15, 2024. While I appreciate the Commission's intent to modernize regulations, I am alarmed that the new draft weakens essential environmental safeguards, putting Texas land, groundwater, and the health of our citizens at risk.

The removal of construction, operation, and closure standards for authorized pits, alongside the lack of groundwater monitoring and liner requirements, leaves us vulnerable to the same dangers that devastated Friendswood. As someone who has lived through the consequences of inadequate environmental protections, I urge the Commission to reconsider these changes—not just for us, but for the future of our children and the generations that will inherit this land.

There are specific areas that demand immediate attention:

### **1. Uniform Standards for Authorized Pits**

The recent draft includes no mandatory construction or closure standards for reserve pits. Without proper safeguards, we are poised to repeat the tragic mistakes of the past. Groundwater monitoring, liner requirements, and closure standards are not just essential; they are reasonable steps to ensure that Texas' thriving energy industry does not jeopardize the health and safety of its citizens.

### **2. Landowner Notification and Consent**

Landowners must be fully informed and give explicit consent before operators bury waste on their land. Hazardous substances such as benzene, arsenic, and diesel can pose severe risks to groundwater and ecosystems, and many landowners may not even be aware of the dangers they face. Just as landfarming regulations require

owner consent, so too should these waste disposal practices.

As we work to balance industry growth with environmental stewardship, we cannot afford to weaken regulations that protect the rights and health of all Texans. **The painful lessons from Friendswood show that once the damage is done, it is our children, and their children, who will pay the price. We owe it to them to act now.**

Thank you for considering these concerns. I look forward to seeing the Texas Railroad Commission take bold steps to protect our natural resources for future generations.

Sincerely,

*Susan Mulloy*  
*Friendswood, TX*