



July 13, 2023

The Hon. Wayne Christian, Chairman
The Hon. Christi Craddick, Commissioner
The Hon. Jim Wright, Commissioner
Texas Railroad Commission
P.O. Box 12967
Austin, Texas 78711

Amend re: enforcement primacy for the federal Class VI Underground Injection Control (UIC) program

Dear Commissioners Christian, Craddick, and Wright,

On behalf of the Greater Houston Partnership and the business community of the 12-county area known as the Energy Capital of the World, I want to state our support for the proposed amendments to 16 Texas Administrative Code Chapter 5 (relating to Carbon Dioxide and related storage activities) and the furtherance of carbon capture use and storage (CCUS) in Texas.

The rapid innovation and progress of the Texas energy industry and its advancements in lower-carbon technologies such as CCUS require a robust regulatory framework. If Texas is to remain a global leader in CCUS, we must pursue regulatory policies and procedures to streamline the permitting process. By allowing the Railroad Commission of Texas to have sole regulatory authority and primary jurisdiction over Class VI wells, we create a stronger regulatory pathway to achieving the development of large-scale CCUS investments and help advance our state's energy competitiveness.

We applaud the Railroad Commission of Texas and the Environmental Protection Agency for their collaboration and commitment in working to ensure the effective implementation and oversight of this framework. Leveraging Texas' expertise, resources, and industry collaboration while ensuring the safe and successful implementation of CCUS technologies is crucial to Texas' energy future.

Regards,

A handwritten signature in blue ink that reads 'Bob Harvey'.

Bob Harvey
President & CEO