



January 11, 2021

U.S. Environmental Protection Agency
EPA Docket Center
Docket No. EPA-R06-OW-2020-0608
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Docket No. EPA-R06-OW-2020-0608 United States Environmental Protection Agency (EPA), Region 6 request for comments for the State of Texas' application for National Pollutant Discharge Elimination System (NPDES)

Dear Administrator Wheeler:

On behalf of the Texas Independent Producers and Royalty Owners Association (TIPRO), I would like to express our appreciation for the opportunity to respond to the United States Environmental Protection Agency (EPA), Region 6 request for comment in support of the State of Texas' application for National Pollutant Discharge Elimination System (NPDES) authority for discharges from produced water, hydrostatic test water and gas plant effluent within the State of Texas.

TIPRO is one of the largest statewide trade associations in Texas representing the oil and natural gas industry. Our members include the largest producers of oil and gas in the state, as well as hundreds of small to mid-sized independent operators and royalty owners. Collectively, TIPRO members produce approximately 90 percent of the oil and natural gas in Texas and own mineral interests in millions of acres across the state. Our organization's mission, since its inception, is to preserve the ability of independent operators to explore for and produce oil and natural gas.

As you know, the Texas oil and gas industry continues to be a cornerstone of our state economy, currently supporting over 2 million direct and indirect jobs and providing billions of dollars in tax revenue annually that support all aspects of our state. In 2019, our state set a new record for oil and natural gas production with 1.8 billion barrels of oil and 10.4 trillion cubic feet of gas produced. While setting new production records, Texas oil and natural gas operators also continued to make significant progress in reducing their environmental impact under state regulatory agencies such as the Texas Commission on Environmental Quality (TCEQ).

As a result of the passage of House Bill 2771 by the 86th Texas Legislature, jurisdiction to regulate oil and gas discharges into water in the state will transfer from the Texas Railroad Commission (RRC) to TCEQ upon program authorization from the EPA. TIPRO supported House Bill 2771 and the move of NPDES authority for oil and gas discharges within the State of Texas from the EPA and RRC to TCEQ.

TCEQ was granted authority by EPA in 1998 to administer the NPDES program for the Clean Water Act programs under its jurisdiction and has done an outstanding job keeping Texas' natural resources safe by adhering to the strict standards set by EPA. Oil and gas discharges,



however, were left regulated by the RRC. TIPRO supports the approval of Docket No. EPA-R06-OW-2020-0608 to allow TCEQ to continue its stellar record of environmental stewardship, now with the oil and gas waste discharge program, and increase regulatory efficiency by centralizing NPDES permitting.

TIPRO has a strong record of supporting our regulatory agencies as appropriate and looks forward to continued work with the EPA and state regulatory agencies on actions impacting the industry. We greatly appreciate your continued work and collaboration with the State of Texas to protect public health and the environment, and thank you again for this opportunity to submit comments.

Respectfully submitted,

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President

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