

Dr. Earthea Nance
Region 6 Administrator
U.S. Environmental Protection Agency
1201 Elm Street, Suite 500
Dallas, Texas 75270

Dear Dr. Nance,

As leaders representing communities across Texas, we strongly encourage the U.S. Environmental Protection Agency (EPA) to approve the State of Texas' application for Class VI Well Primacy. As the nation's leading energy producer, including traditional and renewable forms, our state has both the robust regulatory infrastructure to safely and effectively permit Class VI wells and the growing demand for carbon storage sites to necessitate state oversight.

States and local communities will need to take advantage of every technology available to reduce carbon emissions. As the nation's largest producer of natural gas, carbon capture and storage is one of the most practical, necessary, and common-sense technologies for Texas because it can significantly reduce carbon emissions from existing energy and petrochemical facilities utilizing fossil fuels. These sectors produce critical building materials, petrochemical and agricultural materials, energy generation, and other industries that underpin our state's economy. By maximizing adoption of carbon storage, the US Department of Energy estimates that Texas can sequester 500 billion metric tons of CO₂, equal to 130 years of US industrial emissions.

Consumer demand is also a key driver for low-carbon fuels. Market demand for low-carbon products is increasing materially, meaning the demand for energy producers and petrochemical manufacturers to provide low-carbon supply isn't just an option, it is a requirement to stay competitive in the global market. Class VI Well primacy is an important piece of this puzzle. Studies have concluded that carbon capture and storage could attract at least \$60 billion in private investment to our state's economy.

With Texas' concentration of industry, academic expertise, and highly trained workforce, our state has all the right ingredients needed to make carbon capture an effective tool for companies to meet this demand. Our state's developed network of infrastructure and ideal geological formations both onshore and offshore will also make Texas a hub for carbon storage. We firmly believe the Texas Railroad Commission has the resources and experience to effectively permit carbon storage wells. As the state agency with primary oversight of our state's vast oil and gas industry, they have extensive experience evaluating permits and issuing timely decisions. Through decades of work involving Texas' subsurface, they have the technological capabilities and a deep understanding of how CO₂ injection would affect Texas' unique geology and impact communities. With a staff of over 1,000 employees, the Commission's experienced engineers and scientists can make independent assessments of Class VI injection wells to ensure they meet rigorous federal and state safety and environmental standards.

Texans are ready to embrace the opportunity to become a global leader in the carbon storage industry. We trust the Texas Railroad Commission to be a steady, diligent authority that will ensure

this emerging industry grows in a safe, community-minded direction. For these reasons, we strongly support the Agency’s recommendation to grant the State of Texas primacy for Class VI injection wells and urge a favorable ruling.

Sincerely,



American Conservation Coalition Action
Baytown Chamber of Commerce
Baytown-West Chambers County Economic Development Foundation
Center for Houston's Future
Conservative Texans for Energy Innovation
Consumer Energy Alliance
Corpus Christi Regional Economic Development Corporation
Dallas Regional Chamber
Deer Park Chamber of Commerce
East Harris County Manufacturers Association
Economic Alliance | Houston Port Region
Fort Bend Chamber of Commerce
Golden Triangle Business Roundtable of Southeast Texas
Golden Triangle Industrial Group
Greater Beaumont Chamber of Commerce
Greater Houston Partnership
Greater Port Arthur Chamber of Commerce
Houston CCS Alliance
Houston East End Chamber of Commerce
Longview Chamber of Commerce
Nederland Chamber of Commerce and Tourist Bureau
North Dallas Chamber of Commerce
North Texas Commission
Odessa Chamber of Commerce
Pasadena Chamber of Commerce
San Patricio County Economic Development Corporation
South Texas Manufacturers Association
Texas Association of Business
Texas Association of Manufacturers
Texas Chemistry Council
Texas Conservation Alliance
Texas Oil & Gas Association