

April 12, 2023

Office of Conservation  
Engineering Regulatory Division  
P.O. Box 94275  
Baton Rouge, LA 70804-9275

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Office of Conservation  
Engineering Division

To Whom It May Concern:

We, the undersigned, are writing to you on behalf of the many stripper-well operators throughout the state to request that you grant consideration to our circumstance with regard to the initiative on venting and flaring of natural gas described in the March 2023 edition of Potpourri. While we appreciate the effort to protect our state's environmental resources, we are concerned that these proposed regulations would create an unbearable burden on producers of stripper wells with limited benefit in terms of environmental impact.

While we have not had sufficient time to put together an estimate of the actual cost of putting into place the required infrastructure and processes that would be required as a result of this new set of regulations, we believe with reasonable certainty that the cost per well and per facility would be significantly greater than the operational margins of these leases would allow. The loss of these operations would result in significant cost to the communities these regulations are intended to protect in terms of loss of jobs, tax revenue, and support of local economies.

In addition, while we have also not had sufficient opportunity to study the existence or rate of actual gas emissions from our stripper-well operations, we believe that it would prove to be a relatively small percentage of the whole when it comes to emissions from all sources throughout the state. This seems to us to be an extreme hardship to take on for our communities in terms of economic impact for little in return in terms of environmental impact.

With that said, we are not unsympathetic to the cause or unwilling to address the issue. We would be open to conducting studies regarding the actual rate of emissions and developing cost-effective means to address the issue in the future, but we do not believe there to be enough time or resources allotted in the proposal to accomplish this according to the suggested schedule. Please consider the unique position of stripper-well producers with regard to this issue. If it is possible to exempt stripper-well operators from these regulations, we would certainly appreciate your consideration of that alternative. If you believe that the regulation is necessary for such small-scale operations, we ask that you consider granting us enough time to properly study and address the issue. We thank you for your help in this matter.

Sincerely,

The Undersigned Operators

Sign

Aubrey Patten

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Caster Production, LLC

Company

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Shelby W. Lee #

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S.H. Lee Oil Corp.

Company

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John T. Thornton

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A J & J Thornton Oil

Company

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LARRY L. BATES

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RYCA ENERGY LLC

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Chad McPartney

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Chadco Inc.

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Leroy James

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JAMES DRILLING CO. INC.

Company

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Hannah A Young

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Bottomland Energy LLC

Company

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Jody James  
James Dils Gas Producer Inc

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Jody E. James

Company

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Timothy L. Page

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Thornton Page Nat Gas

Company

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Murphy Oil Company LLC

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[Signature]

Company

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Victor H. Page

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Page Development, LLC

Company

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Kevin P. Wilson

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K. Wilson Enterprises Inc.

Company

Office of Conservation  
Permitting Division

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*Kevin E. Windham*

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Kevin E. WINDHAM

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WINDHAM OIL CORP.

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*Mark J King*

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Sonny King

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*Mark J King*

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