

## Cecelia Hartley

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**From:** Sunset  
**Sent:** Thursday, November 18, 2010 11:15 AM  
**To:** Cecelia Hartley  
**Subject:** FW: TCEQ Sunset Staff REport

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**From:** Victor McDonald  
**Sent:** Thursday, November 18, 2010 10:52 AM  
**To:** Sunset  
**Subject:** TCEQ Sunset Staff REport

The comment area was not able to be accessed on the staff report page on the website, so I am submitting my initial comments on the TCEQ staff's recommendations via this email.

This staff has done a good job and is to be commended on a very complex and difficult assignment. The report was well assembled in a very concise and user friendly fashion.

There are a few recommendations that I would like for you to consider adding or altering in your final presentation;

### Issue 1

Transferring the groundwater protection to the RRC would be a grave error. Their charge to this point is as an industry economic promoter and not a proper regulatory agency. Until the RRC can exhibit an honest desire to perform true regulatory functionality it would be a mistake to allow them control of groundwater monitoring and compliance to proper environmental standards. Possibly once the RRC has proven this ability it would make more sense to allow them a regulatory function in this area.

### Issue 5

The TCEQ's drought contingency plan needs to specify and assume control over water withdrawals from major water users, specifically those of for-profit entities such as natural gas extraction facilities. In times of drought these facilities will, if left unchallenged, draw a detrimental amount of supply from the state's inventories.

### Issue8

The tonnage cap on emissions should be removed altogether. In fact it should operate on a graduated scale with higher costs/ton being imposed on the larger emitters.

Thank you for all the hard work that you put into a very well done project.

C. Victor McDonald  
Denton, Tx.