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April 4, 2023

Attn: F. Jonathan Rice Engineering-Regulatory Division Office of Conservation P.O. Box 94275 Baton Rouge, LA 70804-9275

RE:

Docket No. R A 2023-13

Mr. Rice:

The new gas venting rules would be the end of stripper production in the state of Louisiana. If it is the goal of the Department of Natural Resources to put stripper producers out of business, this is a great way to do it.

Most stripper wells emit a small amount of natural gas. Attempting to capture this natural gas would not be economically feasible for most stripper wells. There are few, if any, sales infrastructures in the stripper fields. Making older production equipment gas tight is not economically feasible. Any increase in annulus/casing pressures in stripper wells, due to attempts to close in the miniscule amount of gas produced, would be devastating to oil production.

The stripper oil production business is mostly a family type business. Multiple generations may be working in these fields at any given time. These people provide for their families, a few employees and the employee's families. They are local, hard working people who live and pay taxes in our state. These people work day and night, rain or shine, cold or hot. They work seven (7) days per week, 365 days per year. These salt of the earth guys and gals ask for little. Any changes to the regulatory environment can tip a small business from profitable to unprofitable.

Please don't allow a political problem put these hard working folk out of business. Consolidation of energy production into fewer hands will lead to less energy security. Period.

As I was finishing this letter, it comes to mind that there are unknown numbers of stripper oil operators in the field this morning working on their wells. They must do that themselves in order to provide for their families. Please extend the deadline for comments by ninety (90) days to give all interested parties enough time to comment on this devastating rule change.

Very truly yours,

Charles McCormick