

Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Docket ID No. EPA-HQ-OW-2025-0157

Dear Administrator Zeldin,

On behalf of the Energy Workforce & Technology Council (EWTC), I appreciate the opportunity to offer comments in strong support of the EPA's proposed approval of Texas' application for primacy over Class VI injection wells.

Energy Workforce & Technology Council is the national trade association for the global energy technology and services sector, historically known as the oilfield services (OFS) and equipment sector, representing more than 250 companies in the technology-driven energy value chain. EWTC advances member policy priorities and empowers the energy workforce of the future.

Our members are the companies on the ground: engineering, building, and operating critical energy infrastructure, including carbon capture and storage (CCS) projects. They are uniquely able to deliver the technology, innovation, and investment needed to meet America's energy goals. However, federal permitting delays continue to hold back billions in private investment and thousands of jobs nationwide. Currently, approval of Class VI permits averages more than two years, further creating uncertainty that discourages investment and slows deployment of CCS projects.

Granting Texas primacy over Class VI injection wells would be a pivotal step forward, removing unnecessary permitting roadblocks and providing essential regulatory certainty. Under the experienced oversight of the Railroad Commission of Texas (RRC), companies could confidently move forward with CCS projects, allowing the state to accelerate innovation, create high-quality technical and engineering jobs, and reinforce Texas' position as America's energy technology leader.

This action is about more than streamlining the permitting process. It is a critical opportunity to bolster America's energy infrastructure, safeguard our energy independence, and build a thriving carbon management sector. Approval of Texas' application will also send a powerful signal nationwide that CCS projects can and should move forward under state leadership, paving the way for investment, innovation, and job creation.

I respectfully urge the EPA to promptly approve Texas' Class VI primacy application, allowing our sector to do what it does best: deploy innovative technologies, support a skilled workforce, and help ensure America's continued energy leadership.

Sincerely,



Tim Tarpley
President Energy Workforce & Technology Council