



## MEMORANDUM

**Date:** July 18, 2023  
**To:** Owners and Operators of Facilities Subject to 20.2.50 NMAC  
**From:** Air Quality Bureau, Compliance & Enforcement  
**Subject:** Conditional Approval for Use of Drones in OGI monitoring

### **Background**

20.2.50 NMAC (“Part 50”) requires monitoring by either EPA Method 21 or Optical Gas Imaging (“OGI”). (See Sections 116, 121 and 122). OGI is defined in Part 50 as “an imaging technology that utilizes a high-sensitivity infrared camera designed for and capable of detecting hydrocarbons.”

The Air Quality Bureau (“AQB”) has received inquiries regarding whether drones carrying an OGI camera may be used to satisfy these requirements. AQB has consulted with U.S. Environmental Protection Agency in determining that, under certain conditions, drones may carry an OGI camera (“OGI-by-drone”) to satisfy the required monitoring.

### **Conditional Approval**

The conditions under which OGI-by-drone is approved for this use include the following:

1. All OGI-by-drone inspections must meet the criteria described at 20.2.50.116.C(5) NMAC;
2. The waivers for inspections of “Difficult to monitor” and “Unsafe to monitor” components described at 20.2.50.116.C(6)(a) and (b) NMAC may not be used unless the components are difficult or unsafe for both OGI-by-drone and OGI-handheld;
3. Drone operators must either be certified in OGI camera operation or work directly with a certified OGI camera operator during monitoring events to assure that conditions are appropriate for OGI monitoring;
4. Drones must be capable of flying (with the OGI camera attached) and hovering within 10 meters (~30 feet) of each source required to be monitored;
5. Sources for which drones cannot “see” with an appropriate background are not eligible for OGI-by-drone; and
6. Monitoring events must record the drone operator’s name, the OGI-certified camera operator’s name, and the average and maximum distance reached by the drone away from the source.

If these conditions are met, OGI-by-drone is presumptively an approved method for meeting the OGI inspection requirements found in Part 50. No Alternative Monitoring Plan is required under these conditions.