November 10, 2025

Trevor Cross
ChampionX
Electronic mail: trevor.cross@championx.com

Via electronic mail

Re: Conditional Approval – ChampionX Arial Optical Gas Imaging Alternative Monitoring Plan for 20.2.50 NMAC

Dear Trevor Cross:

This letter serves as a conditional approval of the ChampionX Arial Optical Gas Imaging application for its technology to be used by companies with facilities subject to the *Ozone Precursor Rule* as a pre-approved alternative monitoring technology pursuant to 20.2.50.116.D(2) New Mexico Administrative Code. To be eligible to use this technology in an Alternative Monitoring Plan, any company wishing to use this pre-approved technology at a specific facility must provide advance notice to the New Mexico Environment Department (Department or NMED) in accordance with 20.2.50.116.D(2)(a).

Companies choosing to deploy the ChampionX Aerial Optical Gas Imaging alternative monitoring plan must do so in a manner consistent with installation and operating practices included in the ChampionX Aerial Optical Gas Imaging Alternative Equipment Leak Monitoring plan provided to NMENV by Champion X on March 19, 2025, which includes, but is not limited to the following:

- The ChampionX Aerial Optical Gas Imaging (AOGI) alternative monitoring plan must be deployed according to the method described in the ChampionX AOGI Method document dated July 12, 2024.

- The ChampionX AOGI alternative monitoring plan must be deployed with technology described in the ChampionX AOGI Technology Description document dated July 12, 2024.

- The gimbal used must have advanced stabilization and 360° field-of-view capabilities to lock onto a target viewing area.

- The OGI camera used must be high-resolution with 640 X 512 pixels minimum and a 50 mm telephoto lens minimum zoom capability to conduct component-level surveys from distance.

- Helicopter OGI Technicians must be senior OGI LDAR technicians (a person with over 2,000 survey hours and a successful performance evaluation, semiannual audits, and biennial classroom refresher training) with specialized training on the helicopter gimbal system's operating envelope, the AOGI-specific standard operating procedures, and inflight safety and communication procedures.

- In-office OGI Reviewers must be trained to identify and interpret leaks in recorded aerial OGI footage, with an emphasis on site layouts, congested equipment areas, and recognition of leaks from multiple viewing perspectives.

- Every site being surveyed must have a continuous OGI recording from arrival through departure to be reviewed, regardless of whether a leak was detected in-flight or not.

- All information required for operators to initiate leak repairs must be sent to operators within 48 hours, with a formal detailed report delivered within five days from the survey date.

- The operator of a facility monitored by ChampionX Arial Optical Gas Imaging must retain and make available for inspection upon request a copy of this approval letter, historical records up to 5 years prior, and any applicable training/certification documents for monitoring system technicians.

The New Mexico Air Quality Bureau thanks you for your interest in providing this service and for your patience as numerous technical questions were addressed during the application approval process.

Sincerely,

Kerra Roudebush Digitally signed by Kerra Roudebush
Date: 2025.11.10 10:32:49 -07'00'

Kerra Roudebush, Air Enforcement Manager
Environmental Protection Compliance and Enforcement Bureau
New Mexico Environment Department