November 10, 2025

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

Via electronic mail

Re: Conditional Approval – ChampionX Soofie Alternative Monitoring Plan for 20.2.50 NMAC

Dear Trevor Cross:

This letter serves as a conditional approval of the ChampionX Soofie 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).

Facilities choosing to deploy the ChampionX SOOFIE Continuous Monitoring alternative monitoring plan must do so in a manner consistent with installation and operating practices included in the ChampionX SOOFIE Alternative Equipment Leak Monitoring plan provided to NMENV by Champion X on April 23, 2025, which includes, but is not limited to the following:

- The ChampionX SOOFIE alternative monitoring plan must be deployed according to the method described in the ChampionX SOOFIE Periodic Screening Method document dated April 8, 2025.

- The alert threshold must be set to 1 kg/h above baseline levels.

- In addition to formal quarterly surveys and reports, the sensor system must be continuously monitoring year-round and site owners/operators must receive an active notification of any confirmed fugitive emission within 24-48 hours.

- When evaluating optimal sensor numbers and placement for any given site deployment, the configuration must achieve no less than 75% spatial coverage over a 12-hour survey period. The number of sensors and their placement must also achieve a calculated probability of detection at 1 kg/h of 90% or greater over a 12-hour survey period.

- Quantification of methane emissions must only occur when wind speeds are faster than 0.4 m/s (1.5 km/h) and the wind direction variability is less than 45° over any 15-minute-averaged period.

- Both calculated 15-minute-averaged and 1-hour-averaged results are appropriate outputs of this method.

- SOOFIE systems must be placed within 100 meters of surveyed equipment or, if deployed at a height of 2 meters, within 1.5 times the height of the potential leak source.

- The SOOFIE system must perform a Digital Automated MOS Synchronization Algorithm check every 3 hours and recalibrate, if necessary and/or practical.

- The SOOFIE MOS sensor must be replaced every 5 years.

- Any regulated equipment unable to be screened using the SOOFIE method must be surveyed using any other approved method in compliance with the Part 50 requirements.

- The operator of a facility monitored by a Champion X SOOFIE system 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 10:38:59 -07'00'

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