

Implementation Plan for Proposed Revisions to 20.2.73 NMAC  
Regarding Greenhouse Gas Emissions Reporting  
July 2, 2007 – DRAFT – For discussion purposes only

2007

- June - Release draft implementation plan for greenhouse gas emissions reporting under proposed revisions to 20.2.73 NMAC
- July – Begin public comment period regarding revisions to 20.2.73 NMAC
- September – Release greenhouse gas emissions reporting procedures to be used (by Title V sources for CO<sub>2</sub> emissions) during 2008 if revisions to 20.2.73 NMAC are adopted.
- October - Propose revisions to 20.2.73 NMAC before the Environmental Improvement Board
- October - NMED finalize greenhouse gas emissions reporting procedures for 2008 reporting year
- If revisions are adopted, inform Title V sources that emissions inventories for 2008 must include CO<sub>2</sub> from combustion, and vented CO<sub>2</sub> if above a threshold level

2008

- Title V sources collect data regarding fuel, fuel use and vented CO<sub>2</sub>
- NMED outreach to major sources to inform them of additional 2009 Title V source inventory requirements for greenhouse gases (see below)
- NMED outreach to minor sources to inform them of 2009 minor source inventory requirements for criteria pollutants and CO<sub>2</sub> emissions from combustion and venting
- As funding allows, NMED expand upon existing studies of area source and minor source greenhouse gas emissions in New Mexico, particularly emissions in the oil and gas sector, and, if the need is indicated, develop proposals for additional minor source greenhouse gas reporting for 2010
- October - NMED finalize greenhouse gas emissions reporting procedures for 2009 reporting year

2009

- Title V sources collect data regarding fuel, fuel use, and vented CO<sub>2</sub>
- Title V sources submit 2008 greenhouse gas emissions data with annual criteria pollutant emissions inventory report
- Minor sources collect data regarding fuel, fuel use and vented CO<sub>2</sub>, along with information needed for criteria pollutant emissions inventory
- NMED outreach to major sources to inform them of additional 2010 Title V source inventory requirements for greenhouse gases (see below)
- NMED announce proposals, if any, for additional minor source greenhouse gas reporting for 2010, and outreach to affected sources
- October - NMED finalize greenhouse gas emissions reporting procedures for 2010 reporting year

2010

- Title V sources collect data regarding fuel, fuel use, vented CO<sub>2</sub>, and direct emissions from the other 5 greenhouse gases
- Title V sources submit 2009 greenhouse gas emissions data with annual criteria pollutant emissions inventory report
- Minor sources submit 2009 greenhouse gas emissions data with criteria pollutant emissions inventory report

---

Anticipated Elements of Greenhouse Gas Emissions Reporting Procedures  
Under 20.2.73 NMAC  
For CO<sub>2</sub> Emissions from Combustion and Venting

NMED would provide:

1. Technical guidance regarding information to be collected and calculations to perform
2. Generally accepted emissions factors
3. For reports that include greenhouse gases other than carbon dioxide, conversion factors to calculate the carbon dioxide equivalent of greenhouse gases

Owner or operator would provide:

1. Fuel type, fuel heat content, and fuel carbon content for each fuel used during the reporting year.
2. A description of the equipment in which the fuel is used (e.g. 250 hp engine).
3. Annual fuel usage of each fuel type. This may be measured (e.g. purchases or metering) or calculated (e.g. horsepower hours times fuel use/horsepower hour)
4. For natural gas and coal bed methane that is processed to remove CO<sub>2</sub> and which has incoming carbon dioxide contents greater than \_\_%, the carbon dioxide content of processed gases before and after processing, and amount of gas processed
5. Calculations, including supporting documentation for any calculation procedures that are different than provided by NMED.
6. Certification that the report is accurate and complete.

### 20.2.73 Implementation Timeline for GHG Emissions Reporting

Draft – July 2, 2007 – For discussion purposes only

YEAR	NMED	TITLE V	MINOR SOURCES
2007	October – finalize GHG reporting procedures for 2008 emissions		
2008	Outreach to Tit. V sources re GHG reporting Outreach to minor sources re 2009 data collection October – finalize GHG reporting procedures for 2009 emissions	Collect data: fuel type, fuel use, vented CO2	
2009	Outreach to Tit. V sources re additional requirements (all GHGs) for 2010 data collection Announce proposals, if any, for additional minor source GHG reporting for 2010 Outreach to minor sources	Collect data: fuel type, fuel use, vented CO2 April 1: Submit combustion & vented CO2 emissions with criteria air pollutant report	Collect data: fuel type, fuel use, vented CO2
2010		Collect data: all direct GHG emissions April 1: Submit combustion & vented CO2 emissions with criteria air pollutant report	April 1: Submit combustion and vented CO2 emissions with criteria air pollutant report
2011		Collect data: all direct GHG emissions April 1: Submit all GHG emissions with criteria air pollutant report	