

**Greenhouse Gas Emissions Reporting
Stakeholder Meeting
May 24, 2007
New Mexico Roundhouse**

Meeting Notes

This focus of the first part of this meeting was to discuss a revised concept for regulations to mandate reporting of greenhouse gas emissions. The revised concept was described in a handout (posted at the NMED website: http://www.nmenv.state.nm.us/aqb/GHG/ghgrr_index.html). Comments received included:

- Comment: Would power plants have to report under both Pt. 73 and Pt. 87?
AQB: No, reporting under Pt. 87 using the CCAR-equivalent tool would satisfy the Pt. 73 requirement.
- Comment: Please send outline out by email.
- AQB: “Reporting year” means emissions year.
- Comment: CCAR reporting is not load-based like The Climate Registry. Utility companies should be reporting electricity purchases and sales so we know how much electricity is non-attributable as to source.
- Comment: Power plants prefer to report based on equity share.
- Question: Will reporting under Pt. 87 provide baseline protection if reporting is based on operational control?
AQB: Baseline protection is about who “owns” emissions; using operational control for determining who reports the emissions is a separate issue. Ownership of the reported emissions can be included in the report, by providing information on equity share of emissions source.
- Comment: Need a longer stakeholder process before proposed rule comes out.
AQB: We have to meet timeline shown in handout. There will be a two month comment period between formal rule proposal and board hearing.
- Comment: Sources that will be reporting under Pt. 87 need to have the modified version of CARROT reporting tool by October, so they will know how to get ready for reporting 2008 emissions.
- Question: Will sectors to be included later in mandatory reporting include oil and gas?
AQB: Yes, but not in this rulemaking, will be through later amendment to rule.
- Comment: This rulemaking has the cart before the horse in relation to the western states cap and trade initiative.

- Question: When will the reg language be ‘frozen’?
AQB: At the end of July. *[Note: NMED Legal Council has since advised that the proposed language will ‘freeze’ at the July 11 Environmental Improvement Board meeting. That is to say, the July 11 version will become the version posted for the formal public comment period (August and September).]*
- Comment: Equity versus operational control reporting: Ownership of emissions should be a contractual issue, not a regulatory decision. BP has about 2300 wells, with different partners – ownership changes a lot, so difficult to track unless operational control is used.
- Comment: Reporting on equity share basis may require divulging confidential business information.
- Comment: With leased equipment, sometimes the lessor can do maintenance, etc., but in other cases they can’t touch the equipment and have no real operational control.
- Question: What if legislation for funding doesn’t pass?
- AQB: We will have to develop an alternative plan.
- Robyn Camp (CCAR): They are starting to develop a local government reporting protocol. They are working on a natural gas transmission and distribution protocol, a technical document from this process may be available.
- Comment: Will the rule specify third-party verification requirements?
- AQB: Yes. The verification will be of the emissions reported to the NM version of the reporting tool.
- Question: Will Pt. 73 reporting be facility-wide, specific units only, or what?
AQB: Reporting under Pt. 73 will be for the permitted (or NOI registered) facility.
- AQB: We will send an email next week, with draft Pt. 73 and Pt. 87, plus a timeline with additional details on comment period.

During the final portion of this meeting, Robyn Camp of the California Climate Action Registry gave a presentation about greenhouse gas emissions reporting protocols. The slideshow for this presentation is also posted at the NMED website:

http://www.nmenv.state.nm.us/aqb/GHG/ghgrr_index.html