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**Notification - NMED's 2010 Greenhouse Gas Reporting**  
**Requirements and Guidance**

Pursuant to 20.2.73 - Notice Of Intent And Emissions Inventory Requirements and 20.2.87 – Greenhouse Gas Emissions Reporting, Greenhouse Gas Emissions (“GHG”) data for emissions year 2010 are required to be submitted to NMED from the following sources:

- Title V sources (subject to permit requirements under 20.2.70 NMAC)
- Electrical generating units, petroleum refineries and cement manufacturers subject to GHG reporting pursuant to 20.2.87 NMAC; and
- Minor (subject to permit requirements under 20.2.72 NMAC but not under 20.2.70 NMAC) and NOI (subject to notice requirements under 20.2.73.200 NMAC) sources operating under one of the following NAICS: 211111, 211112, 213111, 213112, 221210, 486210, 486110 & 486910. Link to NAICS: <http://www.naics.com/search.htm> (2009).

On September 22, 2009, EPA finalized a mandatory GHG reporting rule which requires reporting for emissions year 2010 for some industrial sources. Although NMED is not the Administrator of EPA's rule, we expect that this rule will affect many New Mexico Title V sources and possibly some minor sources. In an effort to minimize duplicative reporting, NMED will accept copies of GHG emission reports submitted to EPA under the federal rule as a method of complying with New Mexico's state GHG reporting rule. NMED also requests additional information, in some cases for emissions year 2010. Use the following link for additional information regarding EPA Reporting rule:

<http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>.

NMED recommends sources subject to GHG reporting use one or more of the reporting options listed in Table 1.1 to comply with New Mexico emissions year 2010 GHG reporting requirements. Alternatively, any source may comply with New Mexico emissions year 2010 GHG reporting requirements by voluntarily reporting GHG emissions to The Climate Registry (“TCR”). Reports submitted to TCR must use TCR's emissions and verification protocols and include the emissions that are required under the state program. All oil and gas sources will be required to use NMED procedures to calculate non-combustion GHG emissions (i.e. vented and process CO<sub>2</sub> and methane emissions). NMED's procedures are at [http://www.nmenv.state.nm.us/aqb/ghg/ghgrr\\_index.html](http://www.nmenv.state.nm.us/aqb/ghg/ghgrr_index.html). If you have any questions regarding

this notification or the referenced procedures, please email [mike.schneider@state.nm.us](mailto:mike.schneider@state.nm.us) or call him at (505) 476-4323.

**Table 1.1: NMED GHG Reporting Options By Source Type**

<b>Source Type</b>	<b>Pollutants</b>	<b>Reporting Options</b>
Title V Oil and Gas	CO <sub>2</sub> & CH <sub>4</sub>	<ul style="list-style-type: none"> <li>• EPA GHG reports or methods, or NMED 2010 procedures for combustion sources; and,</li> <li>• NMED 2010 procedures for non-combustion sources</li> </ul>
Title V non-oil and gas (Excluding sources subject to 20.2.87 NMAC)	CO <sub>2</sub> & CH <sub>4</sub>	<ul style="list-style-type: none"> <li>• EPA GHG reports,</li> <li>• EPA methods applied to facilities not subject to EPA reporting,</li> <li>• NMED 2010 procedures; or,</li> <li>• Best Available Data <u>only</u> for sources lacking quantification methods under EPA methods or NMED procedures</li> </ul>
Power plants, refineries and cement manufacturing (subject to 20.2.87 NMAC)	All GHGs (as defined in 20.2.2.7.M NMAC)	<ul style="list-style-type: none"> <li>• EPA reports; or,</li> <li>• EPA methods applied to facilities not subject to EPA reporting rule; <u>and,</u></li> <li>• NMED's procedures for indirect emissions (i.e. purchased electricity, steam and heat)</li> </ul>
Minor New Source Review ("NSR") oil and gas including NOI's	CO <sub>2</sub> & CH <sub>4</sub>	<ul style="list-style-type: none"> <li>• EPA GHG reports or methods, or NMED 2010 procedures for combustion sources; and,</li> <li>• NMED 2010 procedures for non-combustion sources</li> </ul>