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Notification - NMED's 2011 Greenhouse Gas Reporting
Requirements and Guidance

****Important Note:** This notification will be modified to avoid double reporting if the New Mexico Environmental Improvement Board adopts 20.2.300 NMAC – Reporting of Greenhouse Gas Emissions and/or repeals 20.2.87 NMAC – Greenhouse Gas Emissions Reporting prior to January 1st, 2011.**

Pursuant to 20.2.73 NMAC - Notice Of Intent And Emissions Inventory Requirements and 20.2.87 NMAC – Greenhouse Gas Emissions Reporting, Greenhouse Gas Emissions (“GHG”) data for emissions year 2011 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.

In an effort to minimize duplicative reporting, NMED will accept GHG emission reports submitted to EPA pursuant to 40 CFR Part 98 as a method of complying with New Mexico's GHG reporting rule. 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 2011 GHG reporting requirements. Alternatively, any source may comply with New Mexico emissions year 2011 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.

If EPA fails to finalize 40 CFR Part 98 Subpart W prior to January 1, 2011, Title V oil and gas sources except will be required to use NMED procedures to calculate non-combustion GHG emissions (i.e. vented and process CO₂ and methane emissions). NMED's procedures are at 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 or call him at (505) 476-4323.

Table 1.1: NMED GHG Reporting Options By Source Type

| Source Type | Pollutants | Reporting Options |
|-----------------------------------------------------------------------------|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Title V Oil and Gas | CO ₂ & CH ₄ | <ul style="list-style-type: none"> • EPA GHG reports or methods, or NMED 2011 procedures for combustion sources; and, • NMED 2011 procedures for non-combustion sources, if, 40 CFR Part 98 Subpart W is not finalized by EPA prior to January 1, 2011. |
| Title V non-oil and gas (Excluding sources subject to 20.2.87 NMAC) | CO ₂ & CH ₄ | <ul style="list-style-type: none"> • EPA GHG reports, • EPA methods applied to facilities not subject to EPA reporting, • NMED 2011 procedures; or, • Best Available Data <u>only</u> for sources lacking quantification methods under EPA methods or NMED procedures |
| 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"> • EPA reports; or, • EPA methods applied to facilities not subject to EPA reporting rule; <u>and,</u> • NMED's procedures for indirect emissions (i.e. purchased electricity, steam and heat) |