

Dear Ms. Ely,

Please consider my comments in the state's deliberation about a methane rule. Even though the public has not seen a draft rule, I reviewed the report prepared by the advisory committee which ended with some recommendations.

The entire premise for a methane rule is faulty because it ignores (or minimizes) the reality that oil and gas development (of any kind) is threatening our future survival, and time is running out.

My bottom line message to you, and to the Governor, is New Mexico must leave our fossil fuel resources in the ground. I hope your advisory committee will now begin working on a real transition plan, away from death-inducing fossil fuel development towards life-affirming renewable energy.

A recent report issued by Oil Change International made some alarming findings.

Since 2010, New Mexico's oil and gas production has grown 125%, to just under 2 million barrels of oil equivalent per day (boe/d) in 2019. Oil and gas production is expected to grow an additional 85% by 2030, reaching 3.5 million boe/d.

From now to 2030, over 70% of New Mexico's oil and gas production will come from wells that have not yet been drilled.

In 2030, annual carbon dioxide (CO₂) emissions from burning New Mexico's oil and gas will reach over 550 million metric tons per year (MMT/yr), the equivalent of 141 coal plants.

In 2030, 86% of projected emissions — 478 MMT — will come from burning currently undeveloped oil and gas. This is equivalent to the annual emissions from 123 coal plants, and over 10 times Governor Lujan Grisham's target for in-state emissions in 2030.

It's hypocritical for New Mexico to set goals for reducing our in-state CO₂ footprint but ignore our state's enormous contribution to the national CO₂ emissions with our exports.

Please reconsider the focus of your agency's work on this most critical issue.

Sincerely,

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