

These messages were sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club Rio Grande Chapter. If you need more information, please contact Sierra Club Rio Grande Chapter at Sierra Club Rio Grande Chapter at [riogrande.chapter@sierraclub.org](mailto:riogrande.chapter@sierraclub.org) or (415) 977-5500.

From: Valerie Aidan  
Sent: Wednesday, September 16, 2020 4:24 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Valerie Aidan

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From: Arthur Alfreds  
Sent: Wednesday, September 16, 2020 10:39 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Generally, I want to preserve New Mexico's beauty and the health of its people

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Arthur Alfreds

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From: Judy Anastasio  
Sent: Wednesday, September 16, 2020 2:35 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please stop polluting our air

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Judy Anastasio

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From: Chris Anderson  
Sent: Wednesday, September 16, 2020 9:47 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Chris Anderson



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From: Sylvia Anderson  
Sent: Wednesday, September 16, 2020 11:07 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Sylvia Anderson

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From: Noel Aronov  
Sent: Wednesday, September 16, 2020 11:13 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

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From: Rudy Baca  
Sent: Wednesday, September 16, 2020 10:42 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

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Sincerely,

Rudy Baca

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From: Alan Baker  
Sent: Wednesday, September 16, 2020 9:49 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Alan Baker

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From: Richard Ballew  
Sent: Wednesday, September 16, 2020 10:13 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

It is time to make the oil producers more environmentally friendly!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Richard Ballew

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From: Ellen Barber  
Sent: Wednesday, September 16, 2020 2:51 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Climate change is costing lives right now. We can't afford not to do everything possible to reduce greenhouse gases. New Mexico must create strong rules to protect our environment from ozone-causing methane pollution.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Ellen Barber

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From: Adriann Barboa  
Sent: Wednesday, September 16, 2020 9:56 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

New Mexico is home our home for over 20 generations. Please support protections.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Adriann Barboa



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From: Elizabeth B. Barnett  
Sent: Wednesday, September 16, 2020 2:40 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Elizabeth B. Barnett

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From: Edwin Beatty  
Sent: Wednesday, September 16, 2020 11:43 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane pollution is a major contributor to loss of the ozone layer -- a loss we cannot afford to see accelerate. Please take action to protect us from methane pollution.  
Thank you.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Edwin Beatty

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From: Weldon Beauchamp  
Sent: Wednesday, September 16, 2020 10:45 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

My name is Dr. Weldon Beauchamp and I have a BA/MS in geology and a PhD in geophysics. I have worked for 40 years in the oil and gas industry. I have never worked for a company that allowed the flaring of natural gas. The flaring of natural gas is wasteful and unnecessary. We need to capture and utilize natural gas as a fuel until we can transition to renewable energy. There are new emerging technology that allow for the use of natural gas for electricity that emits no CO2. We also need to make efforts to locate and repair our networks of natural gas pipelines which are ageing and leaking. We also need to make greater efforts to utilize geothermal energy.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Sincerely,

Weldon Beauchamp

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From: Chris Becker  
Sent: Wednesday, September 16, 2020 11:21 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please prevent Methane pollution in New Mexico. Any pollution is detrimental to our children's future and current public health.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Chris Becker

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From: Margaret Bell  
Sent: Wednesday, September 16, 2020 9:47 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Margaret Bell

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From: Karen Benke  
Sent: Wednesday, September 16, 2020 12:25 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

New Mexico cannot afford to be at the top of another negative list. Please protect our citizens from unhealthy air and beautiful skies from dirty pollution. Thank you.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Karen Benke

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From: Bo Bergstrom  
Sent: Wednesday, September 16, 2020 11:31 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Bo Bergstrom



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From: Walter Bishop  
Sent: Wednesday, September 16, 2020 2:48 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

My family moved to the San Fernando Valley, just north of Los Angeles, in 1959 when the smog from Los Angeles would just top the mountains on the south side of the valley. Then a few years later, the smog was in the valley as a brown haze. LA and California had a problem and it wasn't until pollution control laws were passed that the air got better.

Stop air pollution now.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Walter Bishop

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From: Rebecca Bleimeyer  
Sent: Wednesday, September 16, 2020 12:12 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We need to push for decreased use of oil and gas and increase clean energy. Jobs don't have to be lost because those workers can be transitioned to those different jobs. Give them first chance at filling those positions.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Rebecca Bleimeyer

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From: Daniel Blumer  
Sent: Wednesday, September 16, 2020 10:22 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Daniel Blumer

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From: Karen Bonime  
Sent: Wednesday, September 16, 2020 1:19 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Dear Governor Lujan Grisham,

We desperately need a new, strong methane rule. Flaring methane at the pump wastes a potentially valuable fuel and adds CO<sub>2</sub> to the atmosphere. Venting methane to the atmosphere contributes proportionately way more than CO<sub>2</sub> does to global warming and the climate emergency. Please do ALL you can to stop these wasteful practices. Thank you, for the sake of the planet and especially the children.

Karen Bonime

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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From: Colleen Boyle  
Sent: Wednesday, September 16, 2020 8:26 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I moved here from Los Angeles 16 years ago to get away from the dirty air and chemicals and because of the natural beauty of New Mexico. I never stop looking at the the beautiful skies both day and night. Our future generations should also have the opportunity to witness these things- it is a fundamental right for them.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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Sincerely,

Colleen Boyle

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From: David Bradbury  
Sent: Wednesday, September 16, 2020 10:33 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

David Bradbury

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From: Zella A. Bray  
Sent: Wednesday, September 16, 2020 11:03 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

There is no Earth # 2! We need climate change now! Unfortunately we are already too late to save some species but maybe we might be able to save ourselves, but at what cost? Without a viable plan to survive pollution and climate change, we need to make changes now!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Zella A. Bray



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From: Anna Brewer  
Sent: Wednesday, September 16, 2020 11:00 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Anna Brewer

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From: Susan Brewster  
Sent: Wednesday, September 16, 2020 1:36 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Ozone pollution has very likely caused (or, at least contributed to) my asthma, which I acquired for the first time after 30 years living in Albuquerque. As a transportation bicyclist who has enjoyed riding outside in our formerly temperate climate, I am also increasingly limited during summer months to my tolerance of the extreme heat due to climate change caused, in part, by methane leakage. Higher afternoon ozone levels in Albuquerque add to my outdoor limitations.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Susan Brewster

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From: Lura Brookins  
Sent: Wednesday, September 16, 2020 4:14 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We have so little time left in this time to STOP methane pollution in our planet....our beloved earth!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Lura Brookins

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From: Jerry Brown  
Sent: Wednesday, September 16, 2020 9:54 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.



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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Jerry Brown

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From: Frances Browne  
Sent: Wednesday, September 16, 2020 12:40 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I am 88 years old. I have a modest income and due to New Mexico's generosity toward the elderly, I pay no state taxes.

But please, Governor, I would like to pay taxes to help, along with other seniors, to offset oil and gas revenues which support our state and public schools. That way we would all be healthier, with less methane in our air and less produced water threatening our water supply. It's time for New Mexicans to pay for our own schools! We should not be relying so much on oil and gas. So please tighten the emissions rules, beef up inspection, and call on seniors like me to do our part.

(You don't have to read all the rest. ??)

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Sincerely,

Frances Browne

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From: Katie Bruell  
Sent: Wednesday, September 16, 2020 9:56 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I am deeply concerned about the impacts of methane on the health and well-being of my fellow New Mexicans. Please do what is right for our people, not for big businesses.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Katie Bruell

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From: Colleen Burke  
Sent: Wednesday, September 16, 2020 10:36 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Colleen Burke



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From: Patrick Burton  
Sent: Wednesday, September 16, 2020 10:07 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane can be useful, or it can be a pollutant. Managing it correctly makes all the difference. The economic damage it causes when not captured is far greater than any cost to manage it appropriately.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Patrick Burton

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From: Keen Butterworth  
Sent: Wednesday, September 16, 2020 2:26 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

New Mexico should be free of petroleum related pollution. We need to reduce emissions immediately. The world is quickly heating up to the extent that environmental problems are threatening all life forms. Reduction must be drastic even at the expense of economic sacrifices

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Keen Butterworth

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From: Leslie Byrnes  
Sent: Wednesday, September 16, 2020 8:23 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Leslie Byrnes

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From: Carol Chamberland  
Sent: Wednesday, September 16, 2020 12:03 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

It makes no sense to flare methane when it could be put to useful purposes. Why let it go into the air we breathe instead of heating our homes?  
We need stronger rules against this pollution in New Mexico.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.



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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Carol Chamberland

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From: Terry Chatterton  
Sent: Wednesday, September 16, 2020 12:06 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please do the right thing.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Terry Chatterton

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From: Gene Chorostecki  
Sent: Wednesday, September 16, 2020 9:45 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Gene Chorostecki

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From: Angela Christie  
Sent: Wednesday, September 16, 2020 10:04 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We will need to do everything we can to try to keep global warming at no more than two degrees Celsius, and even then, climate scientists have indicated we will face losing half of all animal species and sixty percent of plants species. Protecting New Mexicans from methane pollution will also contribute to national and international efforts to try to save the planet. In other words, it is an important win for everyone.

Again, thank you for your support.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

These messages were sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club Rio Grande Chapter. If you need more information, please contact Sierra Club Rio Grande Chapter at Sierra Club Rio Grande Chapter at [riogrande.chapter@sierraclub.org](mailto:riogrande.chapter@sierraclub.org) or (415) 977-5500.

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Angela Christie



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From: Elizabeth Christine  
Sent: Wednesday, September 16, 2020 1:12 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

There is no time left to continue with business as our highest priority despite ecological damage.

For the continuation of life in all forms we must prioritize the purity of all the elements which sustain us. Deep appreciation for all turning into the right direction!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Elizabeth Christine

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From: Jeff Clark  
Sent: Wednesday, September 16, 2020 9:57 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Jeff Clark

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From: Kathleen Cody  
Sent: Wednesday, September 16, 2020 2:25 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please, we need stronger regulations in place to protect our state, communities and residents. New Mexico is one of if not the largest emitter of methane, there needs to be more oversight. Lets not make our sick and damaged communities even more so.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Kathleen Cody

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From: Isabel Constable  
Sent: Wednesday, September 16, 2020 10:03 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I am so concerned about the oil and gas industry polluting our scarce and precious fresh water reserves and polluting the air we inhale and contributing to global warming and future droughts. Please Governor Michelle Lujan Grisham use your power and wisdom to diversify our state's sources of energy and income. We need to stop this toxic fracking practice and change now! Uncomfortable and expensive as this may be future generations will thank us and I will sing your praise.

Thank you!

Isabel (Constable)

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Isabel Constable

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From: James Cooke  
Sent: Wednesday, September 16, 2020 10:02 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

James Cooke

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From: Gerald Courvoisier  
Sent: Wednesday, September 16, 2020 9:50 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

slash methane waste now

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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Sincerely,

Gerald Courvoisier

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From: Rachael Dalto  
Sent: Wednesday, September 16, 2020 9:52 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Rachael Dalto



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From: Wayne Darnell  
Sent: Wednesday, September 16, 2020 10:40 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Our climate already is in dire straits, and we must do all reasonable things to combat climate change. Please do everything possible to limit methane pollution of our air.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Wayne Darnell

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From: Delese Dellios  
Sent: Wednesday, September 16, 2020 3:02 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Gov. Lujan Grisham,  
You treated the spread of Covid-19 like an emergency and I applaud your tangible and strong efforts. It is now time to treat the climate crisis as the emergency that it is. NM is experiencing aridification, prolonged droughts, low water flows, reduced snowfalls, higher temperatures and increased heat waves. You must be bold in implementing the strongest possible rules to eliminate methane emissions. This too is a public health hazard NOW and in the future. Your legacy and our existence is at stake. Please do the right thing!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Delese Dellios

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From: Anita Deming  
Sent: Wednesday, September 16, 2020 10:51 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Anita Deming

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From: Sharon Dogruel  
Sent: Wednesday, September 16, 2020 3:08 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is a dangerous and serious threat to our environment and the state has the responsibility of protecting all New Mexicans from the impact of this deadly gas. We are facing the consequences of climate change - record heat, drought, wild fires - and methane must be kept to a minimum - if at all. It is not OK to keep destroying our environment!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:



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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Sharon Dogruel

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From: Martha Doster  
Sent: Wednesday, September 16, 2020 1:07 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane pollution is yet one more problem caused by mis-managing our resources. Perhaps - long ago - we didn't understand how it worked or what the consequences of it's existence would be, but today (and frankly for the past too many years!) we DO know better...and we MUST do something about it. Do the RIGHT thing - put in controls, limitations, money for research and training for alternative solutions. Think outside the box!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Martha Doster

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From: Karen Douglas  
Sent: Wednesday, September 16, 2020 10:55 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane gas leakage from oil and gas wells, and pipelines, are proven contaminated, and can be dangerous. A NM Gas Co natural gas pipeline runs only about 60 feet behind our property, and has already been "relocated" once due to problems.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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Sincerely,

Karen Douglas

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From: Laurel Drew  
Sent: Wednesday, September 16, 2020 1:29 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I am aware that greenhouse gases, especially methane come from far more than merely cattle and horses. Oil and gas wells produce much in waste products. Stop blaming the beef industry and advertising how clean gas wells are and enforce the laws to Make those wells cleaner. I care about our land, air and water and especially about climate change which IS happening. Please enforce the laws meant to help limit these factors and help our earth.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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Sincerely,

Laurel Drew



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From: Robert Dudley  
Sent: Wednesday, September 16, 2020 10:11 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We desperately need additional legislative measures to help protect our environment and our people from the harmful effects of methane in our atmosphere. Please add these crucial measures to help protect us all.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Robert Dudley

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From: Will Duff  
Sent: Wednesday, September 16, 2020 10:23 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

New Mexico can have the cleanest oil extraction/storage/pipelining in the world if the state rules are tough enough. As we move to clean energy, we can keep the revenue that the state needs so badly coming if we clean up our oil/gas business infrastructure. Take the lead!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Will Duff

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From: Dennis Dunnum  
Sent: Wednesday, September 16, 2020 11:36 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We are watching the entire West coast of the US in flames, the South coast being inundated with floods and the East coast worried about their cities submerging while the interior of the country is sporadically hit with all of the above. We KNOW how methane affects the atmosphere and how dramatically it advances global climate change. WHY ARE WE EXEMPTING 95% OF THE OIL AND GAS INDUSTRY FROM LEAKING IT???????

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Dennis Dunnum

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From: Deanna Dyke  
Sent: Wednesday, September 16, 2020 12:44 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We need to do everything possible to reverse climate change, and methane capture is only one measure.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.



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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Deanna Dyke

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From: Cynthia Edney  
Sent: Wednesday, September 16, 2020 9:57 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is a deadly greenhouse gas that is not getting enough recognition.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Cynthia Edney

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From: Suzanne Eiseman  
Sent: Wednesday, September 16, 2020 4:31 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We as a state cannot afford to contribute to global warming! We can and should be responsible oil and gas producers.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Suzanne Eiseman

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From: Carol Elder  
Sent: Wednesday, September 16, 2020 1:07 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Carol Elder



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From: CAROLBETH ELLIOTT  
Sent: Wednesday, September 16, 2020 10:48 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Leave fossil fuels in the ground!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

CAROLBETH ELLIOTT

These messages were sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club Rio Grande Chapter. If you need more information, please contact Sierra Club Rio Grande Chapter at Sierra Club Rio Grande Chapter at [riogrande.chapter@sierraclub.org](mailto:riogrande.chapter@sierraclub.org) or (415) 977-5500.

From: Helen Faller  
Sent: Wednesday, September 16, 2020 10:31 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Helen Faller

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From: Ella Joan Fenoglio  
Sent: Wednesday, September 16, 2020 12:16 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Just a personal note here at the end, Governor! The air quality of New Mexico is important to me, to all citizens and to our children's future. Please do all you can to reduce/eliminate methane! Thank you very much.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Ella Joan Fenoglio

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From: Robert Fischhoff  
Sent: Wednesday, September 16, 2020 11:49 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.



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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Robert Fischhoff

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From: Kristina Fisher  
Sent: Wednesday, September 16, 2020 4:01 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Kristina Fisher

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From: Russell Fletcher  
Sent: Wednesday, September 16, 2020 10:46 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Russell Fletcher

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From: Mark Follett  
Sent: Wednesday, September 16, 2020 4:46 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Sincerely,

Mark Follett



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From: LONDA FOWLER  
Sent: Wednesday, September 16, 2020 12:11 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Sincerely,

LONDA FOWLER

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From: CHARLES FOX  
Sent: Wednesday, September 16, 2020 10:53 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is an extremely potent greenhouse gas. The continued release of methane exacerbates an already dire climate emergency. Every possible reduction in atmospheric methane pollution should be mandated without further delay.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

CHARLES FOX

These messages were sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club Rio Grande Chapter. If you need more information, please contact Sierra Club Rio Grande Chapter at Sierra Club Rio Grande Chapter at [riogrande.chapter@sierraclub.org](mailto:riogrande.chapter@sierraclub.org) or (415) 977-5500.

From: Katy Fuchs  
Sent: Wednesday, September 16, 2020 12:35 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for protecting our air.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Katy Fuchs

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From: Martina Fuentevilla  
Sent: Wednesday, September 16, 2020 10:44 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.



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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Martina Fuentevilla

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From: Robert Gaines  
Sent: Wednesday, September 16, 2020 11:22 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I like breathing and prefer not to roast.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Robert Gaines

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From: Maria Isabel Galbe  
Sent: Wednesday, September 16, 2020 1:04 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

My community, in Chaparral NM, is fighting against a new permit of El Paso Electric to transform fracking gas into electricity. That will be MORTAL... for us... with all the chemicals reactions and pollution of our clean air. And NM is quite ahead of Texas in GOOD regulations to stop that type of terrible pollutants. PLEASE HELP OUR STATE that is going in the good direction..... Healthy Life is more important that enrichment of certain business.... CARE FOR HUMANITY AN CREATION.....

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Maria Isabel Galbe

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From: George and Dee Gamble  
Sent: Wednesday, September 16, 2020 1:42 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We all want to breathe!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

George and Dee Gamble



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From: Tom Gardner  
Sent: Wednesday, September 16, 2020 12:29 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

This should be a no brainer considering the threat of global warming.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Tom Gardner

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From: Mark Gates  
Sent: Wednesday, September 16, 2020 9:54 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Sincerely,

Mark Gates

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From: John Geissman  
Sent: Wednesday, September 16, 2020 10:15 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Look at what is going on, RIGHT NOW, TODAY (!!!!!!!). September 16, 2020. Much of the west coast of the US will NEVER return to normal. NEVER. New Mexico set record temperatures several days this summer. Next will be massive food and water scarcity issues. We know what the solution is, and we know what the consequences are if we do not act. Just how far will the Sixth Extinction go? Thank you. John

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

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-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

John Geissman

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From: Walter Gerstle  
Sent: Wednesday, September 16, 2020 10:39 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

For God's sake, please take strongest possible action to limit methane emissions! Our climate is suffering: wild fires, drought and excessive heat in New Mexico, hurricanes, polar ice melting. This will only get worse if we do not change our ways. We must stop emitting greenhouse gases. This is an existential issue.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Walter Gerstle

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From: Robert Gilman  
Sent: Wednesday, September 16, 2020 10:12 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Robert Gilman

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From: Acazia Gilmore  
Sent: Wednesday, September 16, 2020 11:25 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Acazia Gilmore

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From: Susanna Glaze  
Sent: Wednesday, September 16, 2020 10:44 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Susanna Glaze



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From: RobinDay Glenn  
Sent: Wednesday, September 16, 2020 11:37 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

New Mexico is truly a "Land of Enchantment." Please ensure that it remains a magical place by protecting our environment against methane and ozone pollution. Eliminate exceptions that vitiate the regulation's purpose.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells — including San Juan, Eddy, Lea and Rio Arriba — are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

RobinDay Glenn

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From: Michael Gold  
Sent: Wednesday, September 16, 2020 11:01 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

we are now in a climate crisis the result of an excess of greenhouse gases. Methane is the most dangerous and we must stop leaking it into the atmosphere. all life on our planet is in immanent danger.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Sincerely,

Michael Gold

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From: MARILYN GONG

Sent: Wednesday, September 16, 2020 11:18 AM

To: Methanestrategy, NM, NMENV

Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

MARILYN GONG

These messages were sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club Rio Grande Chapter. If you need more information, please contact Sierra Club Rio Grande Chapter at Sierra Club Rio Grande Chapter at [riogrande.chapter@sierraclub.org](mailto:riogrande.chapter@sierraclub.org) or (415) 977-5500.

From: Arifa Goodman  
Sent: Wednesday, September 16, 2020 10:11 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.
- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.



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-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Arifa Goodman

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From: Susan Gordon  
Sent: Wednesday, September 16, 2020 10:29 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We cannot continue to allow industries to endanger New Mexicans health. Methane pollution is easy to stop and would in the longterm be a money maker for the oil and gas industries. We also need to restructure the NM budgets that make schools dependent on extraction industries for the money used to fund our schools. We need to diversify our state income sources. Legalizing marijuana would be a strong first step.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Susan Gordon

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From: Jane Gowe  
Sent: Wednesday, September 16, 2020 2:04 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

It is so important to ensure methane safeguards for our future.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Jane Gowe

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From: Sandra and Glenn Griffin  
Sent: Wednesday, September 16, 2020 9:43 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Sandra and Glenn Griffin



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From: Minrose Gwin  
Sent: Wednesday, September 16, 2020 12:52 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

As I write this message, the West Coast is burning up and the Southeast is flooding. Please let New Mexico be a beacon of hope in the fight against pollution and climate change. Thank you. Minrose Gwin Ph.D.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Minrose Gwin

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From: Jo Ann Hakola  
Sent: Wednesday, September 16, 2020 9:45 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Keep our state and our earth safe!

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Jo Ann Hakola

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From: Heather Hanley  
Sent: Wednesday, September 16, 2020 11:35 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Heather Hanley

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From: Merry Harsh  
Sent: Wednesday, September 16, 2020 4:17 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.



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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Merry Harsh

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From: Sherie Hartle  
Sent: Wednesday, September 16, 2020 10:02 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Sherie Hartle

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From: Le Roy Henderson  
Sent: Wednesday, September 16, 2020 11:03 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

This action will benefit both the citizens of New Mexico, but will also provide another revenue stream for oil and gas. That revenue means more revenue for the State.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Le Roy Henderson

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From: Kent Hickman  
Sent: Wednesday, September 16, 2020 11:36 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

The five New Mexico counties home to 97% of New Mexico's oil and gas wells ? including San Juan, Eddy, Lea and Rio Arriba ? are either already violating federal ozone standards or at risk of doing so in the near future. Methane is a powerful greenhouse gas responsible for a quarter of the climate change we are experiencing today. It will also have a direct effect on addressing ozone in New Mexico.

That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Kent Hickman



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From: Carl Hitchens  
Sent: Wednesday, September 16, 2020 8:33 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Estimates from climate scientists give us 10 years to reverse catastrophic doom. Methane, particularly here in NM, where sun and solar energy grids could help save us and the planet, while contributing jobs and income for New Mexico, is essential.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Carl Hitchens

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From: Gary Holcomb  
Sent: Wednesday, September 16, 2020 9:53 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Gary Holcomb

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From: Jacob Holguin  
Sent: Wednesday, September 16, 2020 1:49 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Jacob Holguin

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From: David Hollenbach  
Sent: Wednesday, September 16, 2020 11:31 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is much more effective, per molecule, than CO<sub>2</sub> in creating climate catastrophe, which is where we are headed.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

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David Hollenbach

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From: Susan Homer  
Sent: Wednesday, September 16, 2020 11:54 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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That is why it is critical that exemptions for stripper wells and the 15-ton-per-year pollution threshold for volatile organic compounds be removed from the NMED rule. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable and falls far below Gov. Michelle Lujan Grisham's goal of establishing nation-leading methane rules.

In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

-- If the capture requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin.

-- We need an open and transparent process for involving the public, including annual reporting requirements on progress and more opportunities to engage on decision-making regionally.

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-- The rule says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. But prior administrations failed to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply.

-- OCD should deny drilling permits for applications without firm agreements for pipeline capacity and impose sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare.

-- Given the well-documented history of widespread non-compliance with venting and flaring reporting, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported.

-- The draft rule carves out too many exemptions for venting, which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit.

-- The rule allows those companies to vent or flare methane during routine operations like maintenance, blowdowns, and pigging (cleaning the pipeline). This is unacceptable, and the rule needs to require gas to be routed around the work and reinjected into the pipeline.

Please update both rules to more meaningfully address the severe threat of methane pollution and ozone precursors coming from the oil and gas industry. Thank you for your time.

Sincerely,

Susan Homer

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From: Molly Houston  
Sent: Wednesday, September 16, 2020 10:07 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

As a retired science and math teacher, I understand the problems we're having with global warming: west coast fires, southern states' hurricanes, and our southwest drought, among other problems US- and world-wide. We cannot afford to sit back and let methane pollution greatly add to the problem! Please help us to do our part in changing the direction toward controlling global warming. It's a fact, not fiction.

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

More than 300,000 metric tons of volatile organic compounds (VOCs) are emitted annually from oil and gas sites across the state. Ozone or smog can worsen respiratory diseases and cause heart disease, posing particular threats to children and the elderly.

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Sincerely,

Molly Houston

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From: Ken Hughes  
Sent: Wednesday, September 16, 2020 1:57 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane should be captured and put to use, not to trash the air

Thank you for your efforts to protect us from COVID-19 and to address ozone and methane pollution.

New Mexico must strengthen both its Environment Department and Oil Conservation Division proposed rules to cut ozone-forming volatile organic compounds and methane from the oil and gas industry. The current drafts fail to protect our health, air, and climate.

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In addition, please extend leak detection and repair requirements to include pneumatic devices, consider requirements for zero-emission pneumatics and consider monthly inspections for high producing well sites just as Colorado has adopted.

The EMNRD rule's goal that 98% of all gas be captured is a worthy one, but please take the following issues into consideration before strengthening and finalizing this rule:

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Sincerely,

Ken Hughes



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From: Helen Huntley  
Sent: Wednesday, September 16, 2020 2:38 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

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Helen Huntley