
From: NMOAI, NMENV
Sent: Thursday, September 17, 2020 7:39 AM
To: Spillers, Robert, NMENV
Subject: Fw: [EXT] Comment on NMED Ozone Precursor Rule for Oil and Natural Gas Sector

From: Nick Knorr [REDACTED]
Sent: Thursday, August 13, 2020 6:32 PM
To: NMOAI, NMENV; Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED Ozone Precursor Rule for Oil and Natural Gas Sector

The Oil and Gas Industry has long operated by transferring costs of production to the public in the form of air and water pollution which is damaging to public health and to the environment. It is time to end this freeloading.

The New Mexico Environment Department recently released draft rules targeting methane emissions and the pollution that leads to smog. These rules are intended to end the practice of the industry which has vented and flared gas without regard for the resulting harm to our communities.

The draft rules, while a welcome step, are undercut by loopholes, which would allow continued emissions. The proposed rules, for example, would exempt stripper wells and set a 15 tons per year pollution threshold which would leave 95% of wells relieved of leak detection and repair requirements. The requirements should apply to pneumatic devices, which are huge sources of emissions. The rules also provide insufficient regulatory supervision and enforcement.

The final rules must remedy these shortcomings and protect the people and lands of New Mexico. With Trump's EPA gutting methane rules federally, our state is left exposed, unless our state government acts.

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Nick Knorr
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