From: Methanestrategy, NM, NMENV

Sent: Thursday, September 17, 2020 9:33 AM

To: Spillers, Robert, NMENV

Subject: Fw: [EXT] Comment on Proposed Methane Rules

From: Stefi Weisburd

Sent: Wednesday, September 16, 2020 12:32 PM

To: Methanestrategy, NM, NMENV

Subject: [EXT] Comment on Proposed Methane Rules

The vast majority of high school students I encounter during our engineering summer programs at the University of New Mexico say that climate change is the defining challenge of their generation, and they are appalled to learn that as New Mexicans they are responsible for emitting more green house gases, especially methane, per capita than the national average.

The rules that the New Mexico Environmental Department are proposing are simply inadequate at controlling unnecessary, wasteful and harmful methane and other gas emissions. By exempting low-volume "stripper wells" and those that produce less than 15 tons of VOCs per year, the rules are potentially excluding 95% of the wells in the state. These emitted VOCs and nitrogen oxides produce ozone levels that threaten the health of children and other vulnerable populations living within half a mile of these facilities. The American Lung Association has already given several New Mexican counties grades of Ds and Fs.

And if that is not enough, have you breathed the air where you live recently? The ash and smoke from the historic fires in California and the west coast that have made their way to New Mexico - those burnt forests, grass, houses, wildlife and, yes, even people, you have inhaled in your lungs, that is our future too. Climate change has pushed us into the second worst drought in 1,200 years. Seventy percent of our state is at increased risk of more frequent and more severe wildfires. It is getting hotter and drier. The Rio Grande is at all time low flows. Our outdoor recreation, ski and tourism industry, farmers and ranchers are all very worried. Our residents with asthma and respiratory illnesses are suffering, and especially during this pandemic air pollution makes us all more vulnerable to the novel Corona virus.

So are you sure you don't want to inspect large wells monthly? Phase in zero-bleed pneumatics and LDAR? Are you sure you don't want to have rules as stringent as our neighbors in Colorado? Are you sure you want to exempt most of the wells in the state?

There comes a time to stand up for the future and what's right. Your children are depending on you. We all are depending on you.

Stefi Weisburd