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**From:** Kuehn, Elizabeth, NMENV  
**Sent:** Wednesday, November 11, 2020 10:42 AM  
**To:** Keller, Anne, NMENV; Baca, Michael, NMENV; Singleton, Kerwin, NMENV  
**Subject:** FW: [EXT] Outdoor Recreation Business Letter Urges Improvements to Methane Rule Making Process

**Follow Up Flag:** Follow up  
**Due By:** Thursday, November 12, 2020 1:00 PM  
**Flag Status:** Flagged

Hi Anne,  
See below, and please post these comments. Please send an email and cc me when they're posted.

Thanks,  
Liz

Liz Bisbey-Kuehn  
Bureau Chief  
New Mexico Environment Department  
Air Quality Bureau  
525 Camino de los Marquez, Suite 1  
Santa Fe, NM 87505-1816  
Office: (505) 476-4305 Cell: (505) 670-9279  
[Elizabeth.Kuehn@state.nm.us](mailto:Elizabeth.Kuehn@state.nm.us)  
<https://www.env.nm.gov/>  
"Innovation, Science, Collaboration, Compliance"

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**From:** Kenney, James, NMENV <James.Kenney@state.nm.us>  
**Sent:** Wednesday, November 11, 2020 10:28 AM  
**To:** Jason Keith PLS <jason@publiclandsolutions.org>  
**Cc:** Propst, Sarah, EMNRD <Sarah.Propst@state.nm.us>; Sandoval, Adrienne, EMNRD <Adrienne.Sandoval@state.nm.us>; Ely, Sandra, NMENV <Sandra.Ely@state.nm.us>; WasteRule, EMNRD, EMNRD <EMNRD.WasteRule@state.nm.us>; Kuehn, Elizabeth, NMENV <Elizabeth.Kuehn@state.nm.us>; Katz, Lara, NMENV <Lara.Katz@state.nm.us>  
**Subject:** Re: [EXT] Outdoor Recreation Business Letter Urges Improvements to Methane Rule Making Process

We can check. Our air program will get back to you. Thank you for inquiring.

Thank you,  
James C. Kenney  
Cabinet Secretary  
New Mexico Environment Department  
Desk (505) 827-2855 | Cell (505) 470-6161  
@NMEnvDep | #IamNMED  
[www.env.nm.gov](http://www.env.nm.gov)

Sent from my iPhone

On Nov 11, 2020, at 10:25 AM, Jason Keith PLS <[jason@publiclandsolutions.org](mailto:jason@publiclandsolutions.org)> wrote:

Secretary Kenney — my colleague submitted comments to the [Ozone Precursor Rule for Oil and Natural Gas Sector](#) (confirmation below), but I do not see it posted on the NMED comments [website](#). Is it possible to confirm that these comments are part of the administrative record? That letter can be found again [here](#).

Thank you!

Jason Keith

Jason Keith / Public Land Solutions  
Managing Director  
P: 303.819.2969  
W: [PublicLandSolutions.org](http://PublicLandSolutions.org)

Begin forwarded message:

**From:** Jeff Thrope <[jeff@publiclandsolutions.org](mailto:jeff@publiclandsolutions.org)>  
**Subject:** Fwd: [EXT] Outdoor Recreation Business Letter Urges Improvements to Methane Rule Making Process  
**Date:** September 16, 2020 at 2:14:20 PM PDT  
**To:** Jason <[jason@publiclandsolutions.org](mailto:jason@publiclandsolutions.org)>

Begin forwarded message:

**From:** "Kenney, James, NMENV" <[James.Kenney@state.nm.us](mailto:James.Kenney@state.nm.us)>  
**Date:** September 16, 2020 at 3:07:26 PM MDT  
**To:** Jeff Thrope <[jeff@publiclandsolutions.org](mailto:jeff@publiclandsolutions.org)>  
**Cc:** "Sandoval, Adrienne, EMNRD" <[Adrienne.Sandoval@state.nm.us](mailto:Adrienne.Sandoval@state.nm.us)>, "Ely, Sandra, NMENV" <[Sandra.Ely@state.nm.us](mailto:Sandra.Ely@state.nm.us)>, "WasteRule, EMNRD, EMNRD" <[EMNRD.WasteRule@state.nm.us](mailto:EMNRD.WasteRule@state.nm.us)>, "Propst, Sarah, EMNRD" <[Sarah.Propst@state.nm.us](mailto:Sarah.Propst@state.nm.us)>  
**Subject:** RE: [EXT] Outdoor Recreation Business Letter Urges Improvements to Methane Rule Making Process

Thank you for your comments.

Thank you -  
Secretary Kenney  
Mobile: (505) 470-6161

-----Original Message-----

From: Jeff Thrope <[jeff@publiclandsolutions.org](mailto:jeff@publiclandsolutions.org)>  
Sent: Wednesday, September 16, 2020 1:49 PM  
To: Kenney, James, NMENV <[James.Kenney@state.nm.us](mailto:James.Kenney@state.nm.us)>; [sarah.cottrell@state.nm.us](mailto:sarah.cottrell@state.nm.us)  
Cc: Sandoval, Adrienne, EMNRD <[Adrienne.Sandoval@state.nm.us](mailto:Adrienne.Sandoval@state.nm.us)>; Ely, Sandra, NMENV <[Sandra.Ely@state.nm.us](mailto:Sandra.Ely@state.nm.us)>; [nm.ojai@state.nm.us](mailto:nm.ojai@state.nm.us); WasteRule, EMNRD, EMNRD <[EMNRD.WasteRule@state.nm.us](mailto:EMNRD.WasteRule@state.nm.us)>  
Subject: [EXT] Outdoor Recreation Business Letter Urges Improvements to Methane Rule Making Process

To the Honorable James C. Kenney and Sarah Cottrell Probst,

Please find the attached letter from the outdoor business

community expressing support for the methane rule making process and urging improvements specifically regarding methane waste and ozone air pollution problems.

Thank you,

Jeff Thrope  
Public Land Solutions  
847-721-2408

September 16th, 2020

James C. Kenney  
Cabinet Secretary  
New Mexico Environment Dept.  
1190 St. Francis Drive, Suite N4050  
Santa Fe, New Mexico 87505

Sarah Cottrell Propst  
Cabinet Secretary  
Energy, Mineral & Natural Resources Dept.  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

The undersigned outdoor businesses applaud Governor Lujan Grisham's commitment to adopting nationally leading oil and gas rules to cut methane and air pollution. While we appreciate the hard work that the New Mexico Environment Department (NMED) and the Energy, Mineral and Natural Resources Department (EMNRD) have done to date to develop such rules, we urge these agencies to make critical changes necessary to protect the health of New Mexicans and grow the state's outdoor recreation industry.

New Mexico has a methane waste and oil and gas air pollution problem, and it's causing harm to the state's unique outdoor recreation brand by ruining our air and harming our climate. Methane is a powerful climate change pollutant responsible for 25 percent of the warming we experience today, and New Mexico is a primary source of our nation's methane pollution. While we work to promote our unique cultural heritage along with our hiking, biking, fishing, skiing, and rafting along with many other outstanding outdoor activities, New Mexico is increasingly known as the nation's leading methane hotspot.

While the NMED and EMNRD proposals begin to address these important methane waste and ozone air pollution problems, they do not go far enough to meet the Governor's goal of establishing nationally leading rules. For instance, large loopholes in the NMED proposal mean it will leave oil and gas air pollution from thousands of wells unchecked. The agency should remove these loopholes. And while the Oil Conservation Division (OCD) of EMNRD has developed a reasonable approach for a methane waste rule, important changes are still needed to limit venting and flaring and require enforcement of gas capture plans.

To keep our air clean and protect the outdoor recreation businesses that are core to the New Mexican economy, we need strong rules to reduce air and climate pollution. We urge NMED and OCD to improve their methane and air quality proposals to meet the Governor's goals and protect our businesses. As we all dig out of the current economic crisis, it's more important now than ever to maintain New Mexico's iconic outdoor brand and continue to grow clean jobs in our outdoor recreation industry.

CC: Adrienne Sandoval, OCD  
Sandra Ely, NMED

Sincerely,

Jay Carroll  
El Rey Court  
Santa Fe, NM

John Watson  
The Radavist  
Santa Fe, NM

Bryan Pletta  
Stone Age Climbing Gym  
Albuquerque, NM

Nick Streit  
The Reel Life  
Taos, NM

Michael Bower  
Taos Ski Valley  
El Prado, NM

Britt Runyon Huggins  
New Wave Rafting LLC  
Embudo, NM

Nick Streit  
Taos Fly Shop  
Taos, NM

Van Beachman  
Solitary Angler  
Taos, NM

Kyle Hawari  
Taos Mountain Energy Foods,  
LLC  
Questa, NM

Martyn Pearson  
Gila Hike and Bike  
Silver City, NM

Jeff Thrope  
Cold Splinters  
Abiquiu, NM