

*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: Barry Ilioff  
Sent: Wednesday, September 16, 2020 11:48 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Since methane is a major contributor to climate change, I am hoping that New Mexico will take the opportunity to slash methane emissions and the other dangerous pollutants that leak beside 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.

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,

Barry Ilioff

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From: Haley Jones  
Sent: Wednesday, September 16, 2020 9:59 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I've lived in Eddy County for 24 of my 30 years on this planet and have seen the air quality decrease since the oil and gas boom started in earnest around 2010. I was away at college and then grad school for much of that time, and had a blessed 6 years with hardly any allergies while I was away. I came back to a haze over town and allergies that never go away no matter what time of year it is. This county will never make or enforce its own methane rules--they love oil and gas money too much. The rules and enforcement have to come from the state. Our air quality continues to diminish and if the state doesn't create strong rules, the oil and gas companies will continue to operate with impunity and no regard for anything but their bottom line.

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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Haley Jones

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From: Jill Joseph  
Sent: Wednesday, September 16, 2020 10:24 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.

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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,

Jill Joseph

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From: Layne Kalbfleisch  
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,

Please maintain and continue to improve on standards for safeguards and appropriate uses for methane. I was exposed as a young person and poisoned by a leak in my home. Thank you for keeping New Mexico safe in this regard.

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,

Layne Kalbfleisch



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From: Norty Kalishman  
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.

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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,

Norty Kalishman

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From: Rozanne Kalsbeek  
Sent: Wednesday, September 16, 2020 10:50 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please protect our beautiful state and our climate!

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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Sincerely,

Rozanne Kalsbeek

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From: Daisy Kates  
Sent: Wednesday, September 16, 2020 10:27 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I understand that the conflict between state revenue and the environmental impact of drilling and fracking is complex. I feel that if we are going to continue to allow fracking or drilling we need to protect the public and our environment with the most stringent rules possible. Do not cut corners on the environmental protections that are needed. We need to improve our air quality and the risks to the population in New Mexico. Please do your part to represent the public to the fullest extent possible in regulating the oil and gas industries.

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

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Sincerely,

Daisy Kates

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From: Eileen Keyes  
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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-- 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,

Eileen Keyes



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From: Jon Klingel  
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,

I breath air. The contribution to climate change is obvious and significant. Flaring is wasteful. I am a former pipeline inspector.

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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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,

Jon Klingel

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From: Nicholas Knorr  
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,

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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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,

Nicholas Knorr

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From: Rebecca Kraimer  
Sent: Wednesday, September 16, 2020 12:13 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.

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,

Rebecca Kraimer

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From: Susan Kutz  
Sent: Wednesday, September 16, 2020 9:44 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.

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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 Kutz



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From: Scott Lake  
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,

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,

Scott Lake

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From: Armando Lamadrid  
Sent: Wednesday, September 16, 2020 11:05 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Dear Governor Lujan,

As a father of two and a long time advocate for the Earth we call our collective home, I am deeply concerned with what we can do to protect the environment to ensure it sustains for the benefit of future generations. Stringent methane rules are an important part of reigning in our wholesale destruction of the environment and transition into a period of responsible environmental stewardship. Such an attitude will help us also innovate and create new job markets. We desperately need you to act on behalf of your voters and future generations. We cannot steal the future from our grand and great grandchildren.

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

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Sincerely,

Armando Lamadrid

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From: Michael Lancaster  
Sent: Wednesday, September 16, 2020 10:01 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

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Sincerely,

Michael Lancaster

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From: Marcia Lander  
Sent: Wednesday, September 16, 2020 9:51 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

This will be a great step toward fighting climate change.

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:

-- 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,

Marcia Lander



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From: Edward LeBlanc  
Sent: Wednesday, September 16, 2020 2:37 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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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,

Edward LeBlanc

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From: Elizabeth Lesman  
Sent: Wednesday, September 16, 2020 9:48 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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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,

Elizabeth Lesman

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From: Lynn Lessard  
Sent: Wednesday, September 16, 2020 3:32 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is messing with people's bodies. It's time to end this destructive force.

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,

Lynn Lessard

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From: John and Pj Liebson  
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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Sincerely,

John and Pj Liebson



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From: Rosemarie Lion  
Sent: Wednesday, September 16, 2020 1:30 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Because for healthy living and a diverse healthy environment for now and our children.

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,

Rosemarie Lion

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From: Paula Lozar  
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.

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Sincerely,

Paula Lozar

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

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Sincerely,

Benjamin Luchini

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From: Dana Ludwig  
Sent: Wednesday, September 16, 2020 11:34 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I have loved this Land of Enchantment for many years was horrified to drive to Carlsbad Caverns and see the affects of methane

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,

Dana Ludwig



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From: Catherine Lynch  
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.

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:

-- 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,

Catherine Lynch

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From: Carol Marion  
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.

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,

Carol Marion

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

Dear Secretary Jim Kenney,

Please, please, please take care of our Earth over your money pockets. 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:

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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 Martin

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From: Theresa Martin  
Sent: Wednesday, September 16, 2020 1:01 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We have a history of bleeding NM out of it's natural resources. We need to take care of the toxins added and spewed out of the mining and oil extraction processes. We have so many toxic "accidents" which linger on for years as in Carlsbad and Los Alamos. When will they right the wrongs? Any industry allowed to work here MUST PAY for restoration and clean up IN ADVANCE. Agree to not harm any delicate balances and be held accountable. Then we can have fighting chance to heal and use clean 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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-- 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,

Theresa Martin



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From: Flora Martinez  
Sent: Wednesday, September 16, 2020 9:48 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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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,

Flora Martinez

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From: Nicki Marx  
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.

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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,

Nicki Marx

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From: Anne Mascovich  
Sent: Wednesday, September 16, 2020 10:21 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

As the fires in CA, the hurricanes in the Gulf Coast, and the melting ice sheets are all overwhelming evidence of climate disruption, we must at LEAST, have oversight of harmful methane emissions, as a step toward mitigation of greenhouse gasses and climate change escalation. We want New Mexico to be a leader in this effort! 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.

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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,

Anne Mascovich

*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: Fern Massar  
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,

This land is precious and so are its people. Please put environmental safety and conservation FIRST.

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,

Fern Massar



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From: Robert McCorkle  
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,

The state government cannot continue to be deaf, dumb and blind to this pollution that adds to the degradation of the atmosphere and causes global warming whose effects are all too obvious this year. This is a waste of money, too. Time to tighten up the regulations!

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,

Robert McCorkle

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From: Jan McCreary  
Sent: Wednesday, September 16, 2020 10:46 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,

Jan McCreary

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From: PJ McDaniel  
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,

We cannot allow methane to be released freely into our atmosphere ? the state must place strict controls on something like this. Our health is vital.

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:

-- 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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-- 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,

PJ McDaniel

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From: Charlene McDermott  
Sent: Wednesday, September 16, 2020 2:24 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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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,

Charlene McDermott



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From: Patrick Mckee  
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,

I am a parent, grandparent and great grandparent concerned with the future and health of my family. In consideration of their safety and health I urge you to take strong measures in regulating ozone and 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.

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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,

Patrick Mckee

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From: Patty Mckinnon  
Sent: Wednesday, September 16, 2020 2:05 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

It is fair and right to monitor and and regulate all greenhouse gasses. Methane is tremendously potent, dastardly and manageable. Please be clear, this is very important to life. Thanks for your service to justice. PJMcKinnon

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,

Patty Mckinnon

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From: Nelda McLaughlin  
Sent: Wednesday, September 16, 2020 1:59 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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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,

Nelda McLaughlin

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From: Shirley McNall  
Sent: Wednesday, September 16, 2020 11:39 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

ALL gas wells need to be regulated and closely monitored for leaks, venting, etc. Once again, our house was gassed by one of the 25 gas wells that surround us within the city limits of Aztec, NM. The latest incident was as follows: On September 8th, at 01:11, I woke up choking and coughing. The air in our bedroom was filled with the distinct odor of gas well emissions including hydrogen sulfide! This was another of many incidents. I went outside. The air was filled with the noxious odor. I closed the bedroom window and waited about an hour. When I went back outside, the odor was gone. I was still coughing and my eyes were burning. I called NM OCD the next morning. An investigation was conducted. One of the operators of the 25 nearby gas wells reported a leaking valve. NMOCD ordered the company to repair the valve immediately. We have no idea how long the valve had been leaking. No one should be subjected to gas well gassing in their home. Emissions are not healthy!

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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Sincerely,

Shirley McNall



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From: Judith Messal  
Sent: Wednesday, September 16, 2020 3:34 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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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,

Judith Messal

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From: Melissa Meth  
Sent: Wednesday, September 16, 2020 12:32 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] CLIMATE CHANGE IS HERE NOW!

Dear Secretary Jim Kenney,

Climate change is here now! ! We can't wait any longer to take action to address ozone and 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.

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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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-- 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,

Melissa Meth

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From: Carolyn Meyer  
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,

New Mexico has a chance to lead in making the right decisions for our state and for our world. I want to leave this state a better place for my child. Please do what's right and show the oil and gas industry we care about 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.

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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,

Carolyn Meyer

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From: Brandi Meza  
Sent: Wednesday, September 16, 2020 3:43 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

This issue matters to me -and should to everyone for that matter- for the sake of NM's future generations. We need to be taking proactive steps to eliminate our reliance on natural gas and combat the methane released into our air through safeguards!

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,

Brandi Meza



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From: Bobbye Middendorf  
Sent: Wednesday, September 16, 2020 12:08 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Climate matters -- matter!

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,

Bobbye Middendorf

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From: Karen Milstein  
Sent: Wednesday, September 16, 2020 1:54 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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-- 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 Milstein

*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: Todd Monson  
Sent: Wednesday, September 16, 2020 10:30 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is a dangerous greenhouse gas.

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,

Todd Monson

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From: Leslie Montgomery  
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,

I love the beautiful land of NM, it's wildlife, clean air and water. Please don't let industry spoil the unique beauty of NM.

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,

Leslie Montgomery



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From: Thomasine Montoya  
Sent: Wednesday, September 16, 2020 11:09 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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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,

Thomasine Montoya

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From: Laurie Moreau  
Sent: Wednesday, September 16, 2020 3:04 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I want us to protect what clean water we have! We must protect clean air and water. Thus ensures life for humans and creatures in 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:

-- 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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-- 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,

Laurie Moreau

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From: Ruth Morris  
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.

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,

Ruth Morris

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From: Edward Mosimann  
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,

What about human caused climate change do we not understand? It is simple. Stop doing what we know is wrong. No excuses. It is time to electrify with sun and wind, or tell the next generations that we hurt the long term survivability of all life on this planet so a few individuals could profit. It will happen. We will electrify. And we don't have to reach crisis levels or temperatures before we commit to building a better future. Thanks Joe ...just stole your line.

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,

Edward Mosimann



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From: Tracy Neal  
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,

As you know, we have missed the boat on dealing with climate change the last 30 years. We have to do everything in our power to cut the damage we're doing to the atmosphere and the planet. I have children and grandchildren, and I want to do everything I can to make their future better--don't 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.

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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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Sincerely,

Tracy Neal

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From: Matt Nielsen  
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.

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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:

-- 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,

Matt Nielsen

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From: Nathan Nielsen  
Sent: Wednesday, September 16, 2020 9:44 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.

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,

Nathan Nielsen

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From: Judith Novak  
Sent: Wednesday, September 16, 2020 9:59 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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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,

Judith Novak



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From: Xavier Obando  
Sent: Tuesday, September 15, 2020 9:19 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.

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

Sincerely,

Xavier Obando

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From: Chemen Ochoa  
Sent: Wednesday, September 16, 2020 4:04 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

The health of every New Mexican especially the children and elderly deserve to breath clean air, drink clean water and eat food that is not full of poisons. This is a Human Right and must be honored in New Mexico. Protect us from unnecessary oil and gas methane pollution and water fracking. Also Chaco Canyon should be off limits to the Oil and Gas industries. If we legalize marijuana then we could use those profits to help our state, like the oil and gas reserves. Also investing in Renewable Energy is a Must.

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,

Chemen Ochoa

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From: Allen Olson  
Sent: Wednesday, September 16, 2020 9:58 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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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,

Allen Olson

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From: Paul Ortega  
Sent: Wednesday, September 16, 2020 10:00 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.

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.

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Sincerely,

Paul Ortega



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From: Christina Otero  
Sent: Wednesday, September 16, 2020 4:38 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We need to develop cleaner methods of producing 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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Sincerely,

Christina Otero

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From: Gordon Parker III  
Sent: Wednesday, September 16, 2020 12:24 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is a dangerous and highly potent substance in multiple ways.

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,

Gordon Parker III

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From: Ronald Parry  
Sent: Wednesday, September 16, 2020 12:27 PM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is a greenhouse gas many time more potent than carbon dioxide. The fossil fuel industry in the US has been in flagrant violation of all efforts to control methane emissions. Emissions of methane must be tightly controlled if we intend to control global climate change. The time for enforcement is 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.

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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-- 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,

Ronald Parry

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From: Don Parsons  
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,

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,

Don Parsons



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From: June Parsons  
Sent: Wednesday, September 16, 2020 10:24 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

We need Clean Green Energy jobs to restore Clean water unpolluted by fracking chemicals, which matters to my health and everyone's health. We need Clean energy for All vehicles and All buildings for clean air unpolluted by methane omissions and CO2 emissions from energy production, which matter to my health and everyone's lungs and overall health. We could dramatically reduce the cost of healthcare in the United States for cancers and lung-related illnesses by cleaning up our air and cleaner energy production, and further reduce our national healthcare costs, by getting carcinogenic (cancer-causing) fracking chemicals out of our ground waters responsible for replenishing our rivers and drinking water supply.

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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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,

June Parsons

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From: Robin Pascal  
Sent: Wednesday, September 16, 2020 11:07 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,

Robin Pascal

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From: Don Patrick  
Sent: Wednesday, September 16, 2020 10:50 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

This gas adds to the total global warming problem we are all facing. Don't weaken it, but increase measures to decrease 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.

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,

Don Patrick

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From: Shannon Patrick  
Sent: Wednesday, September 16, 2020 11:52 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.

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,

Shannon Patrick



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From: Raul Pedraza  
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.

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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,

Raul Pedraza

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

Dear Secretary Jim Kenney,

Methane accelerates climate collapse. Need I say more. Save the planet.

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,

Anne Petrokubi

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From: Philip Pfeiffer  
Sent: Wednesday, September 16, 2020 10:08 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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-- 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,

Philip Pfeiffer

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

Dear Secretary Jim Kenney,

Please protect our fragile environment, which is currently under unprecedented assault, by regulating and cutting the dangerous amount of methane being released in our air. This odorless gas should be captured and put to use as an energy source.

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,

P. Porter



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From: Marita Prandoni  
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,

Governor Lujan-Grisham:

If the devastation from the US West Coast wildfires aren't proof enough that our emissions have caused an existential climate crisis, what will it take to convince New Mexico's policymakers that we must cease to damage the atmosphere? Methane is more than 20 times more powerful than CO<sub>2</sub>. Stop the flaring from gas wells and the disgusting practices of factory farm manure lagoons. It is your political will we are all depending upon. Please represent your constituents. Transition energy generation away from fossil fuels and farming away from CAFOs. The alternatives are there and proven to be regenerative and effective.

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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-- 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,

Marita Prandoni

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From: Patricia Prasad  
Sent: Wednesday, September 16, 2020 10:14 AM  
To: Methanestrategy, NM, NMENV  
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Climate warming cannot be denied  
Methane is a big factor in climate warming. Please take all measures to decrease this problem.

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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Sincerely,

Patricia Prasad