

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 or (415) 977-5500.

From: Laura Ramirez
Sent: Wednesday, September 16, 2020 10:05 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.

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 or (415) 977-5500.

-- 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,

Laura Ramirez

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 or (415) 977-5500.

From: Janet Rees
Sent: Wednesday, September 16, 2020 10:47 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane is a huge contributor to climate change, and the West now has an incredible number of large and destructive wildfires along with constantly increasing temperatures and drought resulting from climate change. San Juan County has had an unresolved ozone problem for years; we are in a drought that has greatly reduced the flow of the Animas and San Juan Rivers, and native vegetation is suffering. Now is the time to eliminate leaking, venting, and flaring of methane by the oil and gas industry. Proposed rules must be strengthened--no exemptions should be allowed considering the current climate crisis. Rule enforcement and use of behavior changing penalties by OCD have been problematic for years--this must also change. It is time for the oil and gas industry to be held responsible for their contribution to the crisis we are in--the industry must be required to take the necessary actions to help eliminate ozone and address the climate crisis.

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.

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 or (415) 977-5500.

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.

-- 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,

Janet Rees

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 or (415) 977-5500.

From: Drew Reese
Sent: Wednesday, September 16, 2020 2:18 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.

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 or (415) 977-5500.

-- 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,

Drew Reese

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 or (415) 977-5500.

From: Mitchell Rekow
Sent: Wednesday, September 16, 2020 11:20 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I have a son and I'm a teacher of high school students. Please help give them a chance at a reasonably safe future. Thank you.

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

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

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

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

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

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

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

-- 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.

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 or (415) 977-5500.

-- 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,

Mitchell Rekow

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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.

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 or (415) 977-5500.

-- 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,

Terry Reser

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 or (415) 977-5500.

From: Michael Frank Rhoderick
Sent: Wednesday, September 16, 2020 9:02 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.

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 or (415) 977-5500.

-- 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,

Michael Frank Rhoderick

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 or (415) 977-5500.

From: Mark Richmond
Sent: Wednesday, September 16, 2020 10:06 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.

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 or (415) 977-5500.

-- 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,

Mark Richmond

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 or (415) 977-5500.

From: Deborah Risberg
Sent: Wednesday, September 16, 2020 11:10 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.

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 or (415) 977-5500.

-- 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,

Deborah Risberg

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 or (415) 977-5500.

From: Les Roberts
Sent: Wednesday, September 16, 2020 12:26 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.

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 or (415) 977-5500.

-- 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,

Les Roberts

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 or (415) 977-5500.

From: Susan Roberts
Sent: Wednesday, September 16, 2020 12:43 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please shore up the rules to end this dangerous pollution in New Mexico.

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

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

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

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.

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 or (415) 977-5500.

-- 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,

Susan Roberts

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 or (415) 977-5500.

From: David Rockwell
Sent: Wednesday, September 16, 2020 12:23 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Why are we wasting the methane gas? It can be used!

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.

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 or (415) 977-5500.

-- 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,

David Rockwell

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 or (415) 977-5500.

From: Jay Rodman
Sent: Wednesday, September 16, 2020 12:57 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

It is criminal to waste fossil fuel by flaring, venting, and leakage in the extraction and processing of natural gas. We must tighten the restrictions and get rid of exemptions that cause air pollution and contribute to climate change!

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.

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 or (415) 977-5500.

-- 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,

Jay Rodman

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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

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

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

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

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

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

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

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

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

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 or (415) 977-5500.

-- 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,

Bryan Romkey

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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

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

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

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.

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 or (415) 977-5500.

-- 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,

Adrienne Ross

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 or (415) 977-5500.

From: Ronald Ross
Sent: Wednesday, September 16, 2020 11:51 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

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

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

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

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

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

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

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

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

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

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 or (415) 977-5500.

-- 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,

Ronald Ross

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 or (415) 977-5500.

From: Emily Rothman
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,

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.

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 or (415) 977-5500.

-- 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,

Emily Rothman

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 or (415) 977-5500.

From: Lorna Ruebelmann
Sent: Wednesday, September 16, 2020 12:30 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Good morning Governor,

As you know, I have watched birds die in my courtyard and smell smoke from scorched earth fires and stopped travel for family funeral and graduations of grand-kids due to the effects of carbon monoxide in the air. Also, the dark skies outside my home I usually enjoy are shrouded so I am unable to see the harvest moon or even Venus. Methane pollution is a major contributor to us no longer being able to enjoy our world or even our 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:

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 or (415) 977-5500.

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

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

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

-- 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,

Lorna Ruebelmann

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 or (415) 977-5500.

From: Denise Saccone
Sent: Wednesday, September 16, 2020 2:34 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.

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.

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 or (415) 977-5500.

-- 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,

Denise Saccone

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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.

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 or (415) 977-5500.

-- 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,

Carol Sassaman

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 or (415) 977-5500.

From: Stephen Schmidt
Sent: Wednesday, September 16, 2020 10:32 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane leaks in huge amounts from faulty valves and equipment on gas producing facilities around the state, especially the four corners area. This is a major contributor to global warming and is a waste of resources and value to producers and the state of NM. We need strong controls on this waste.

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.

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 or (415) 977-5500.

-- 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,

Stephen Schmidt

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 or (415) 977-5500.

From: Susan Selbin
Sent: Wednesday, September 16, 2020 10:18 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

New Mexicans need to be protected from methane pollution.

As you know, methane is a powerful greenhouse gas (80 times more powerful than CO₂) and the main component of natural gas that escapes at every step of oil and gas extraction.

The Environment Department's proposed rule would exempt 95 percent of wells from oversight -- and the Oil Conservation Division's proposed rule gives industry ample opportunity to continue venting methane pollution

New Mexico is the nation's third-biggest oil and gas producer. Producers in our state leak, vent and flare enough methane to heat every home in New Mexico, but instead they allow it to escape into our atmosphere. And with those leaks come health-endangering smog precursors.

As the Trump administration guts national methane safeguards, New Mexico has stepped up to create its own rules to slash methane waste and ozone pollution -- but the state's proposed rules need work to strengthen the rules to safeguard our health and 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.

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 or (415) 977-5500.

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.

-- 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.

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 or (415) 977-5500.

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 Selbin

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 or (415) 977-5500.

From: Alison Shafer
Sent: Wednesday, September 16, 2020 10:19 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.

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 or (415) 977-5500.

-- 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,

Alison Shafer

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 or (415) 977-5500.

From: Fiana Shapiro
Sent: Wednesday, September 16, 2020 7:56 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Reducing methane emissions is a key component to reducing the upward trend of climate change. Please stand strong on this issue. The people of New Mexico, along with the people of the world, are counting on you and other leaders to make big actions to fight climate change.

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.

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 or (415) 977-5500.

-- 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,

Fiana Shapiro

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 or (415) 977-5500.

From: Dylan Shaw
Sent: Wednesday, September 16, 2020 1:21 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.

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 or (415) 977-5500.

-- 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,

Dylan Shaw

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 or (415) 977-5500.

From: Sandra Shoshani
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,

As a middle school science teacher for 45 years, I have striven to familiarize all my students with issues of environmental degradation. I moved to New Mexico 5 years ago and, as I read and heard more about issues related to the oil and gas industry here, I have become appalled at the lack of concern expressed by legislators and the state administration. Without stronger action to address the threats of methane pollution and ozone precursors, the state of New Mexico is complicit in destroying the environment for both the residents of this state and adjoining ones. The Federal government has been loosening regulations on oil and gas; it is tantamount that the state must be more forceful in protecting the environment. Thank you for your attention.

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.

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 or (415) 977-5500.

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.

-- 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,

Sandra Shoshani

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 or (415) 977-5500.

From: Kayley Shoup
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.

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.

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 or (415) 977-5500.

-- 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,

Kayley Shoup

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 or (415) 977-5500.

From: Carolyn Simmons
Sent: Wednesday, September 16, 2020 11:28 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

As the effects of climate change show greater and greater impacts across our country and the world, it is imperative to do all we can to reduce the harm we are doing to the environment. Furthermore, this methane pollution is toxic to our own health. I urge you to do all you can to protect us from such methane pollution.

Sincerely,
Carolyn Simmons

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

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

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

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

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

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

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

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

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

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

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

-- 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,

Carolyn Simmons

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 or (415) 977-5500.

From: Camille Singaraju
Sent: Wednesday, September 16, 2020 11:19 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Methane pollutes the air clean air is an unalienable right of all people in the US. ?You can survive three minutes without breathable air? You can survive three days without drinkable water.? Therefor Air and Water, becomes unalienable rights of each person?s Life. If one drinks contaminated water the bacteria, viruses, or chemicals, one becomes sick. If one breaths air contaminated with viruses, airborne chemicals, or particles, one becomes sick. Therefore, the Liberty to access ?Clean Air and Water? is an unalienable right to ensure one does not get sick or dies.

This logic establishes access to Air and Water are the Peoples? Unalienable Rights.

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.

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 or (415) 977-5500.

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.

-- 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,

Camille Singaraju

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 or (415) 977-5500.

From: Rachel Singer
Sent: Wednesday, September 16, 2020 11:24 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please protect us and the environment by updating these rules and leading the way forward to greater safety and sustainability.

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.

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 or (415) 977-5500.

-- 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,

Rachel Singer

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 or (415) 977-5500.

From: Nancy Singham
Sent: Wednesday, September 16, 2020 2:47 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I recently drove to California (camping along the way) to see my 2 sons, one having major surgery, the other soon moving to Portugal. I got to experience first hand the terror of wondering if a lightening strike would force evacuation of my campsite, breathing hazardous air, and knowing that family friends working in the fields near Gilroy are risking their lives for our food. Climate change is here, NOW, all over the world, and in our drought stricken state. Methane leaks from NM are adding daily to this chaos. I beg you, please support the strictest methane standards possible. The cost of not doing so can hardly be calculated.

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.

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 or (415) 977-5500.

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.

-- 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,

Nancy Singham

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 or (415) 977-5500.

From: Marijean Snowden
Sent: Wednesday, September 16, 2020 12:26 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.

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 or (415) 977-5500.

-- 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,

Marijean Snowden

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 or (415) 977-5500.

From: Angela Soete
Sent: Wednesday, September 16, 2020 10:56 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.

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.

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 or (415) 977-5500.

-- 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,

Angela Soete

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 or (415) 977-5500.

From: Lori Solanki
Sent: Wednesday, September 16, 2020 12:43 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

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

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

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

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

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

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

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

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

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

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 or (415) 977-5500.

-- 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,

Lori Solanki

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

The urgency of strong action to cut greenhouse gas emissions could not be clearer, with wildfires devastating California, where my oldest child lives, and the dangerous Cat 2 hurricane Sally simultaneously hitting the gulf coast. We simply must be bold in implementing the strongest possible rules to control methane venting and flaring. NO sources of methane emissions can be exempted from strong controls. Are the costs to do this worth it? Just ask the millions in the West, choking on toxic smoke, or seeing their homes destroyed by fire. Please do the right thing for my 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.

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

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

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

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

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

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

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

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

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

-- 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,

Thomas Solomon

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

I am a lifelong New Mexico resident, and I have watched our oil and gas industry needlessly vent and flare methane for decades. Although there must be an economic reason that the oil and gas industry does not already capture that methane, the environmental consequences are now clear. New Mexico can and should lead the way in responsible energy production. It is time to capture methane, not vent or flare it, and we should have responsible regulations in place to make that happen.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

David Soules

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 or (415) 977-5500.

From: Roger Southward
Sent: Wednesday, September 16, 2020 8:41 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please protect us from further methane pollution.

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

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

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

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

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

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

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

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

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 or (415) 977-5500.

-- 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,

Roger Southward

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 or (415) 977-5500.

From: Judith Clark Stanley
Sent: Wednesday, September 16, 2020 11:15 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

The west is experiencing multiple conflagrations. The resulting smoke travels around the world, causing long-term damage to the health of every living thing. Methane is an important greenhouse gas. We MUST limit the release of methane due to oil and gas production. I urge you to protect God's creation, including every living thing, from this menace.

Especially in New Mexico, where so many poor people live next to oil and gas installations and live with constant harm, we need strong laws and enforcement. It is unconscionable to damage the environment for a short-term gain.

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

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

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

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

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

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

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

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

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

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

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

-- 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,

Judith Clark Stanley

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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.

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 or (415) 977-5500.

-- 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,

Sydnae Steinhart

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 or (415) 977-5500.

From: Carmon Steven
Sent: Wednesday, September 16, 2020 12:57 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.

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 or (415) 977-5500.

-- 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,

Carmon Steven

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 or (415) 977-5500.

From: Paul Stoehr
Sent: Wednesday, September 16, 2020 11:46 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.

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 or (415) 977-5500.

-- 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,

Paul Stoehr

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 or (415) 977-5500.

From: Sarah Stout
Sent: Wednesday, September 16, 2020 3:31 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I am urging you to support tightened rules about methane release. We are not in a game looking for the short-term benefits of compromise with the industry for more short-term gains. Please look at both the overall environmental and human effects of increased release of methane. Please look beyond the short-term view.

I attended a couple of the forums held last year by the NM Environmental Department. We, the citizens of this state, are very concerned. Thank you.

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

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

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

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

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

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

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

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 or (415) 977-5500.

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

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

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

-- 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,

Sarah Stout

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 or (415) 977-5500.

From: Dianne Stromberg
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,

I am glad you are the Governor. You know the state's children are hugely impacted by our air quality.

Thank you for all you do.

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.

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 or (415) 977-5500.

-- 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,

Dianne Stromberg

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 or (415) 977-5500.

From: Lois Sury
Sent: Wednesday, September 16, 2020 10:41 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.

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 or (415) 977-5500.

-- 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,

Lois Sury

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 or (415) 977-5500.

From: Thomas Talbot
Sent: Wednesday, September 16, 2020 12:43 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Fossil fuels are not so slowly poisoning and destroying our planet. Continuing to promote, develop and relax guidelines for them is short sighted and greedy.

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.

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 or (415) 977-5500.

-- 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,

Thomas Talbot

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 or (415) 977-5500.

From: Dennis Tapley
Sent: Wednesday, September 16, 2020 11:20 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Must go renewable.

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.

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 or (415) 977-5500.

-- 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,

Dennis Tapley

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 or (415) 977-5500.

From: Mariateresa Tellez
Sent: Wednesday, September 16, 2020 9:39 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Many children and adults are suffering of allergies and asthma in my community of Chaparral NM. PLEASE we need clean air for our children. Please support the decision to have laws that give 'green' industries here in New Mexico.
Thank you.

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

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

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

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

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

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

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

-- 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.

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 or (415) 977-5500.

-- 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,

Mariateresa Tellez

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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

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

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

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

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

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

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

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

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

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 or (415) 977-5500.

-- 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,

Shirley Van Slooten

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 or (415) 977-5500.

From: Jennifer Vellinga
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.

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.

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 or (415) 977-5500.

-- 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,

Jennifer Vellinga

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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.

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 or (415) 977-5500.

-- 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,

Kathy Vigil

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 or (415) 977-5500.

From: Hida Vioria
Sent: Wednesday, September 16, 2020 10:17 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.

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 or (415) 977-5500.

-- 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,

Hida Vilorio

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 or (415) 977-5500.

From: Karen Walker
Sent: Wednesday, September 16, 2020 10:57 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Let's go completely green energy! I don't care about lost jobs in the fossil fuel industry-- if we provide retraining they can all be redirected into clean energy jobs, recycling, infrastructure, etc. The handwriting is on the wall....even little steps like this won't help much---we need to think of the future and break our dependence on carbon fuels immediately! It's unconscionable that every major banking institution is heavily-invested in fossil fuels--- goddamnit, profit isn't everything---and profit can be had where you design 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:

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 or (415) 977-5500.

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

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

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

-- 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,

Karen Walker

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 or (415) 977-5500.

From: Leslie Waltzer
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,

Because I want my grandchildren to have a viable 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.

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 or (415) 977-5500.

-- 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,

Leslie Waltzer

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 or (415) 977-5500.

From: Nicholas Ward
Sent: Wednesday, September 16, 2020 10:09 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

If we do not take measures to protect the environment NOW, things are going to get much worse and people will start dying directly due to the ravages of climate change. And at that point, it will be too late to do anything about it. Take measures to curb things while we can still make the necessary changes.

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.

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 or (415) 977-5500.

-- 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,

Nicholas Ward

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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.

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 or (415) 977-5500.

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

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

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

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

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

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

Sincerely,

David Waymire

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 or (415) 977-5500.

From: R.A.L. West
Sent: Wednesday, September 16, 2020 10:19 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.

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 or (415) 977-5500.

-- 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,

R.A.L. West

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

We are witnessing alarming signs of global warming and climate change all across our continent. Please take action to reduce greenhouse gasses in New Mexico. Do it for our children. We need you to stand firm. Thank you.

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

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

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

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

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

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

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

-- 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.

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 or (415) 977-5500.

-- 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,

Dave Weymouth

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 or (415) 977-5500.

From: Patricia Whalen
Sent: Wednesday, September 16, 2020 4:28 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.

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 or (415) 977-5500.

-- 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,

Patricia Whalen

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 or (415) 977-5500.

From: Landra White
Sent: Wednesday, September 16, 2020 10:06 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.

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 or (415) 977-5500.

-- 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,

Landra White

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 or (415) 977-5500.

From: BRYCE WHITING
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,

After reviewing carefully the facts and details concerning methane emissions within New Mexico, I want to personally express my will as a resident of New Mexico that more needs to be done to regulate the fossil fuel industry that benefits at the expense of the future, the environment, and those that are most vulnerable. Thank you.

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

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

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

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

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

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

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

-- 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.

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 or (415) 977-5500.

-- 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,

BRYCE WHITING

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 or (415) 977-5500.

From: Amy Williams
Sent: Wednesday, September 16, 2020 4:42 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

Please preserve our lands and wild places and animals for future generations!

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.

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 or (415) 977-5500.

-- 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,

Amy Williams

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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

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.

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 or (415) 977-5500.

-- 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,

Janet Williams

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 or (415) 977-5500.

From: Neil Williams
Sent: Wednesday, September 16, 2020 11:08 AM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I was an NMED engineer once, in the Groundwater and Surface Water Bureaus. I wrote regulations to protect drinking water quality and coordinated with the OCD on cleanups.

It's not OCD's job to save the oil industry. Your job is the important work of writing and enforcing good tight effective regulations. Do not exempt operators and owners from their responsibility to eliminate dangerous methane emissions! The leaks, flares, "venting" and methane cloud are egregious and should be embarrassing. The job is not getting done. Make industry fees pay for your staff to monitor and enforce the limits. Tell the governor what other legislative authorization you need to do the job better.

Thanks!

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.

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 or (415) 977-5500.

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.

-- 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,

Neil Williams

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 or (415) 977-5500.

From: Elizabeth Wiseman
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,

This is not a disposable planet. Please do the responsible thing.

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

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

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

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

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

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

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

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

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 or (415) 977-5500.

-- 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,

Elizabeth Wiseman

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 or (415) 977-5500.

From: Ben Work
Sent: Wednesday, September 16, 2020 1:10 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Comment on NMED and EMNRD methane rules

Dear Secretary Jim Kenney,

I am praying that i will never see New Mexico burn to the ground like California and this is one of the only ways we can ensure 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.

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 or (415) 977-5500.

-- 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,

Ben Work

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

I believe that the oil and gas industry and other extractive industries should pay the true cost of their production process. This means that they should reduce or eliminate the methane gas that is released during production.

Evidence of climate change is all around us. Actions that add to and exacerbate our warming planet Must Be Regulated. It is unacceptable to me that the oil and gas industry is profiting at the expense of everyone and everything in New Mexico.

Sincerely,

Angie Wulfow

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

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

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

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

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

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

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

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

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

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

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

-- 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,

Angie Wulfow

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 or (415) 977-5500.

From: Glenn Yocum
Sent: Wednesday, September 16, 2020 4:51 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.

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 or (415) 977-5500.

-- 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,

Glenn Yocum

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 or (415) 977-5500.

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

Dear Secretary Jim Kenney,

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

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

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

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

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

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

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

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

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

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 or (415) 977-5500.

-- 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,

Pamela Yven

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 or (415) 977-5500.

From: Kristen Zamora
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,

I grew up in NM and love our clear air and blue skies. My children are growing up here, with asthma. Without CO2 regulations the air we breath will continue to get worse. What will the air be like when my grandchildren are born? CO2 regulations are imperative to clean, breathable air.

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

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

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

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

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

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

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

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

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 or (415) 977-5500.

-- 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,

Kristen Zamora