From: Anixter, Mari, DOH
Sent: Saturday, August 29, 2020 10:43 AM
To: Jimenez, Billy, DOH
Cc: Methanestrategy, NM, NMENV
Subject: RE: Comments on DRAFT Rules

Billy,
Can you help me with this? Or, who can?

Thanks in advance,
Mari

Mari Anixter
Communications Director

NEW MEXICO DEPARTMENT OF HEALTH

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From: Methanestrategy, NM, NMENV <NM.Methanestrategy@state.nm.us>
Sent: Friday, August 28, 2020 9:26 AM
To: Anixter, Mari, DOH <Mari.Anixter@state.nm.us>
Subject: Fw: Comments on DRAFT Rules

Mari,
Are these formal comments from the DOH on NMED's and EMNRD's draft rules?

Thanks,

Liz

Liz Bisbey-Kuehn
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Air Quality Bureau
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"Innovation, Science, Collaboration, Compliance"

From: Giese, Michele, DOH
Sent: Friday, August 28, 2020 9:13 AM
To: Methanestrategy, NM, NMENV; WasteRule, EMNRD, EMNRD
Subject: Comments on DRAFT Rules

To Whom it May Concern,

Here are my comments regarding the DRAFT Rules:

For the New Mexico Environmental Department: Please remove loopholes that would exempt the vast majority of wells from leak detection and repair. This is unacceptable. Please remove the exemption for stripper wells and the 15 tons per pollution threshold for volatile organic compounds.

For the Energy, Minerals, and Natural Resources Department: Please set the requirement for gas capture by locality either by county or basin. If not, companies operating in multiple localities could just elect one locality and disproportionately affect one or the other basins in NM and will not reach the 98% capture goal set by the NM Oil Conservation Division.

Thank you
-Michele

Michele Giese RN
Health Promotion Specialist

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