From: Dylan Staack <dylan.staack@repss.com>
Sent: Thursday, August 20, 2020 3:23 PM
To: Methanestrategy, NM, NMENV
Cc: Dave Thomas
Subject: [EXT] Rule 50

Ms. Bisbey-Kuehn,

My name is Dylan Staack and I am industrial hygienist at REPSS.

As a distributor of environmental monitoring equipment across the country, we see trends in how companies make decisions for their monitoring systems. While we feel Rule 50 is a great step in the right direction for environmental monitoring procedures, however we do have some concerns, they are as follows:

1. Method 21, while once exclusively effective, is no longer the leading technology for LDAR practices and should not be listed as an equivalent option to OGI practices. We feel that NM should reference 60.5397a in OOOOa; encouraging the use of cutting edge OGI technology.
2. Allowing 15 days to fix a leak detected with Method 21 vs the 7 days when detected with OGI incentivizes companies to use Method 21. An equal timeline for all leaks should be applied being that quantitative severity of the leak would be equal with either method. There is no evidence that supports the claim that leaks detected by OGI are greater than leaks detected using Method 21. Furthermore, Method 21 is an subjective test since users control the distance at which a sample is take from a facility; OGI is an objective test that accurately indicates all leaks at their point of origin.
    a. Leaks detected using ANY method will likely worsen with more time, and allowing one method to achieve an extended timeline amplifies the overall environmental impact of the leak if the full timeline is spent before the leak is remediated; both methods should therefore be held to the same timeline (whatever is determined) to ensure leaks are remediated in a manner that is environmentally protective.

In our 20 years of experience, the majority of decisions are made based on how lenient regulations are, not on best practices. We would ask that you reconsider differing timelines for remediation and set a standard that adequately reduces the environmental impact of a leak once it is detected.

Thanks you for your time and consideration,

Respectfully,

Dylan Staack

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