From: Methanestrategy, NM, NMENV
Sent: Friday, September 4, 2020 10:40 AM
To: Kuehn, Elizabeth, NMENV
Subject: Fw: NM Methan Rule comments--7 vs. 15-day remediation

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From: Derek L. Smith <dlsmith29@hotmail.com>
Sent: Wednesday, August 19, 2020 10:41 AM
To: Methanestrategy, NM, NMENV
Cc: David Furry
Subject: [EXT] Fw: NM Methan Rule comments--7 vs. 15-day remediation

Dear Panel;

LSI is offering further comment with respect to the new methane rule, pertaining specifically to the repair of leaks discovered by Method 21 techniques vs. OGI. We infer that the discrimination--7 days for OGI-identified leaks *vs*. 15 days for Method 21-identified leaks--connotes a perception that the leaks identified by the former are necessarily much more severe because of a lower sensitivity and, therefore, must be addressed more quickly, and we appeal for a correcting of the record on that point.

We feel that this difference is unwarranted in light of the fact that FR OOOOa specifies that OGI is the best work practice for detecting fugitive emissions. Multiple figures presented in that registered standard speak to the equivalence or superiority of the passive technique, including with respect to the sensitivity thereof. Furthermore, a technical support document (TSD-40CFR Part 60, Appendix K) was dedicated and published to quantify the ample sensitivity of OGI to low-concentration leaks. Finally, Table 1 in the OOOOa regulations indicates that the repair-re-survey interval for wells and compressor stations shall be 30 days, regardless of the methodology that was implemented for monitoring.

In light of the fundamental studies that have been performed since the promulgation of Method 21, continuing through AWP and Subpart OOOOa; we respectfully submit that NMED consider the normalization of the repair interval for both techniques--be it 15 or 30 days--to the same duration so as to reflect the equivalence of the two approaches. To that end LSI thanks the Bureau for your consideration of this appeal.

David L. Furry
President-Leak Surveys, Inc.

Derek L. Smith, D. Chem.
C. C. O.-Leak Surveys, Inc.