Comments Pertaining to 20.2.50 NMAC: Oil and Natural Gas Regulations for Ozone Precursors

These comments have been prepared on behalf of Dugan Production Corp. The following lists the concerns and questions we have as an oil and gas operator:

1. In 20.2.50.12.A.2 it states operators must create a plan to minimize emissions as it pertains to SSM. We question the need to have a plan. We do not question the need to minimize emissions. We feel that with all of the data tracking and reporting requirements the NMED is making the plan for operators. Perhaps it is not correct but we feel this is a pointless requirement that doesn't reduce emissions. It will be generated and filed away and forgotten on a server.
2. Why does an operator need permission to use an already approved Alternate Monitoring Strategy? Once the alternative is approved by the NMED we appreciate the need to notify the appropriate people of the operator's choice to implement the alternative but having to sit and wait for approval when the alternative was already approved for a different operator appears to be an unnecessary road block.
3. As record keeping goes we are concerned about the requirement to keep a record of serial numbers. Second hand equipment and older equipment don't always have that information readily available. Sometimes name plates fall off or are intentionally removed. We understand the intent is to make sure when tracking equipment the NMED wants to know for sure the correct information is being kept but in some cases the serial number will not be available. It is our hope the NMED will modify this requirement such that it allows for equipment that no longer can be identified by a serial number.
4. May an operator voluntarily begin to comply with standards in 40 CFR 60 and/or 63 in order to avoid complying with this rule? It may or may not be easier to comply with one rule over the others but in this case it may be beneficial to an operator to choose to comply with one rule for all engines instead of identifying which engines are covered by which rule. Perhaps it displays ignorance on this commenter's part but there are many cases where it is better to live by one rule for everything instead of sorting out which rule is applicable and where it is applicable.
5. As it pertains to compressor engines may operators elect to comply with 40 CFR 60 IIII instead of complying with this rule?
6. We don't understand how a 2 hour window is used to determine that an engine or turbine now needs to be documented. We agree that emissions happen while maintaining and repairing engines. We appreciate the desire to minimize emissions. An

arbitrary 2 hour window doesn't seem to make sense. The record keeping requirements already require operators to document all repairs and maintenance. As such what does it matter whether the maintenance and repairs took 2 hours?

7. It appears the standards for reciprocating compressors require operators to install an hour counter on all reciprocating compressors. We don't take issue with this requirement if an operator chooses to track the time of service in hours. However if an operator chooses to comply by changing the rod packing every 3 years what difference does it make how many hours the unit ran? Please modify the language to plainly explain that rod packing use time must be tracked via an hour counter only if the operator has chosen the hours of service as the trigger for changing the rod packing. An operator who chose every 3 years gains no benefit by installing an hour counter.
8. One additional concern is the cost of EMITT. We are unfamiliar with such devices. It appears the usage of such devices will dramatically reduce reporting requirements which is a win for all parties involved. We are also aware that it appears that stripper wells and facilities that prove their PTE is less than 15 tpy avoid the need for such devices. We are concerned however there may be facilities where none of these types of relief are applicable and assets that are marginally economic will be prematurely abandoned due to costs associated with implementing EMITT technology. Again we are not familiar with these devices but it is a concern we have and wanted to bring it to light.
9. We appreciate the desire to minimize emissions during a well workover but to our knowledge this is physically impossible. Once an operator begins removing rods and tubing from a well during a workover there is no way to control the gas rising up the well bore. Sure there is blowout prevention equipment and other devices that are designed to function as emergency equipment that will capture the gas but the moment that equipment is used the workover is stopped and cannot resume until the BOP is taken out of service and the rods and tubing are free to be pulled.