From: Methanestrategy, NM, NMENV
Sent: Friday, September 4, 2020 10:40 AM
To: Kuehn, Elizabeth, NMENV
Subject: Fw: Methane Strategy comments--aerial vs. ground survey

Importance: High

From: Derek L. Smith <dlsmith29@hotmail.com>
Sent: Monday, August 17, 2020 4:15 PM
To: Methanestrategy, NM, NMENV
Cc: David Furry
Subject: [EXT] Fw: Methane Strategy comments--aerial vs. ground survey

Dear Panel,

we are commenting on the new Methane Strategy—specifically, the prospect pertaining to 20.2.50.16 C. NMAC of including the existing technology of aerial surveillance into the new Strategy. Specifically, the feedback sought concerns whether these technologies are "enforceable, effective and equivalent."

Enforceable

LSI has built an industry-leading career based upon the concept that prominent sources of emission can be identified aerially and is more cost effective for the operator, but still be effective enough to reduce Methane emissions. Our practice provides verifiable, irrefutable evidence of the leak; indeed the EPA Alternative Work Practice (AWP) of 2011 was instituted because infrared surveys have been proven to be valid at identifying significant sources of fugitive emission.

Effective

A rule of thumb in the LDAR industry estimates that 90% of the total volume of emissions are attributable to a scant 3% of the leaks. Moreover, these major leaks are of the type that require wide-angle, rather than up-close inspection: they include unlit or improperly functioning flares, leaking tank hatches and PRVs and VRUs. At any time an entity or Agency wants to conserve resources, but cost-efficiency becomes more important at times when resources are reduced. With the aerial approach these known most significant sources will be identified preferentially at a rate of 60-100 per day, rather than 5-10 per day by a ground operator. Furthermore; this improved efficacy not only prioritizes the identification of the worst sources but also provides for broader characterization of the degree of overall compliance by a particular operator, a population of large operators and across sectors and broader geographic regions.

Equivalent

To the extent that aerial surveys are compared to ground-based inspection, the proposed approach is equivalent to the approved method of OGI, for the underlying technology—infrared thermography—is identical. The only differences are the extent of coverage and the prioritization of the most significant sources.

We thank you for your advocacy of the environment and of the industrial concerns whose bottom lines are impacted by these emissions and of our suggestion concerning how to optimize the approved approach to identify and eliminate them.

Respectfully,

David Furry
President
Leak Surveys Inc.

Dr. Derek Smith
Chief Compliance Officer
Leak Surveys Inc.

Sent from Mail for Windows 10