From:	Methanestrategy, NM, NMENV
To:	Kuehn, Elizabeth, NMENV
Subject:	Fw: [EXT] Public Comment on Methane Rule from NM Public Health Association
Date:	Friday, September 4, 2020 10:39:21 AM

From: New Mexico Public Health Association <nmpha.mail@gmail.com>
Sent: Wednesday, August 26, 2020 4:41 PM
To: Methanestrategy, NM, NMENV
Cc: Melissa Ontiveros; shelley.mann-lev@nmpha.org; vrangel@nmcf.org
Subject: [EXT] Public Comment on Methane Rule from NM Public Health Association

Please do everything possible to close the loopholes in the proposed rule that would exclude 95% of existing wells. New Mexico needs stronger methane rules to ensure that we protect our communities and the world's climate.

According to the EPA, in addition to climate effects, methane leaks from the oil and gas industry pose health risks to surrounding communities. When methane escapes from the oil and gas sector, it comes with other hitchhiker air pollutants like benzene, hydrogen sulfide, formaldehyde, toluene, and xylene. These ozone-forming pollutants can trigger life-threatening asthma attacks, aggravate respiratory conditions, and also, increase a person's risk of developing cancer.

"Methane is the main component of natural gas – the energy resource used to generate about 1/3 of our nation's electricity and an important industrial, commercial and residential energy source. But the lack of oversight of New Mexico's oil and gas industry has resulted in a substantial waste of an important domestic energy resource and needless pollution that threatens the climate and public health. Our analysis of recent peer-reviewed methane research and other data sources reveals that intentional emissions (venting), equipment leaks and other unintentional sources (fugitive emissions), and the combustion of gas (flaring) results in New Mexico's oil and gas operators emitting 570,000 tons of methane every year – equivalent to the climate impact of approximately 12 coal-fired power plants. A 2015 study using NASA airborne technology found that in New Mexico's San Juan Basin, high emitting sites make up nearly half of the region's total point source emissions (Frankenberg et al). Another 2015 study found high methane emissions in the Four Corners Region using an aircraft balance method and concluded that oil and gas emissions were likely the largest source (Smith et al)."(https://www.edf.org/sites/default/files/new-mexico-methane-analysis.pdf)

The New Mexico Public Health Association acknowledges that ground level ozone , is harmful to human health and damaging to the environment and property, and supports governor Michelle Lujan Grisham's 2019 "climate strategy," which she signed as an executive order compelling state regulators to craft a rule that would reduce the amount of ozone ejected into the atmosphere above New Mexico. The proposed rule does NOT fulfill this objective. Please modify it to ensure the order is met.

Respectfully,

Shelley Mann-Lev and Melissa Ontiveros, Co-Presidents

New Mexico Public Health Association
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