From:	Methanestrategy, NM, NMENV
To:	Kuehn, Elizabeth, NMENV
Subject:	Fw: [EXT] Letter for Governor Lujan Grisham on Methane Rules
Date:	Friday, September 4, 2020 10:29:56 AM
Attachments:	MLG - Methane Rule Letter.pdf ATT00001.htm

From: Kuehn, Elizabeth, NMENV
Sent: Thursday, August 27, 2020 4:12 PM
To: Methanestrategy, NM, NMENV
Subject: FW: [EXT] Letter for Governor Lujan Grisham on Methane Rules

Liz Bisbey-Kuehn
Bureau Chief
New Mexico Environment Department
Air Quality Bureau
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"Innovation, Science, Collaboration, Compliance"

From: Kenney, James, NMENV <James.Kenney@state.nm.us>
Sent: Monday, August 24, 2020 2:59 PM
To: Katz, Lara, NMENV <Lara.Katz@state.nm.us>; Kuehn, Elizabeth, NMENV <Elizabeth.Kuehn@state.nm.us>
Cc: Ely, Sandra, NMENV <Sandra.Ely@state.nm.us>
Subject: FW: [EXT] Letter for Governor Lujan Grisham on Methane Rules

Can you make sure this gets into the record?

Thank you –
Secretary Kenney
Mobile: (505) 470-6161

From: Buerkle, Caroline, GOV <Caroline.Buerkle@state.nm.us>
Sent: Monday, August 24, 2020 2:52 PM
To: Propst, Sarah, EMNRD <Sarah.Propst@state.nm.us>; Kenney, James, NMENV <James.Kenney@state.nm.us>
Subject: FW: [EXT] Letter for Governor Lujan Grisham on Methane Rules

FYI-CB

From: Jordan Vaughan Smith <jordan@cavu.org>
Sent: Monday, August 24, 2020 2:48 PM
To: Buerkle, Caroline, GOV <Caroline.Buerkle@state.nm.us>
Cc: David Shiverick Smith <david@cavu.org>
Subject: [EXT] Letter for Governor Lujan Grisham on Methane Rules

Hi Caroline,

I hope you are doing well despite the onslaught of challenges from COVID and the looming budget difficulties.

I have a letter I hope you will be able to get in front of the Governor regarding the draft methane regulations (woot, isn't that exciting to write!).

Thanks for all you do for our state!

Jordan Smith
Executive Director

CAVU -
Climate Advocates/Voces Unidas

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Dear Governor Lujan Grisham,

It is with enthusiasm and gratitude that I thank you for your outstanding leadership to reduce carbon emissions in one of the largest oil and gas producing states in the union and making methane regulation a cornerstone of your climate policy. I believe your governorship will be largely remembered by your swift and decisive response to COVID. Yet, the Energy Transition Act and the Methane and Air Pollution rules set forth by EMNRD and the Environment Department will also leave indelible marks on your legacy. Your leadership has been paramount to their success, and it is for this reason I write to you today.

During the face of COVID, your government has had to make considerable concessions for the sake of public health. While methane is one of the most potent greenhouse gases, dangerous air pollutants known as volatile organic compounds that purport to cause cancer, asthma, COPD, and a host of upper respiratory problems are leaked and vented alongside methane waste and pollution. As you well know, COVID affects the respiratory system making the reduction of VOC's and ozone critical to our public health. In New Mexico, seven counties exceed the national standard for limits on ozone, five of which are in the San Juan and Permian Basin and are a direct result of venting and cold flaring of natural gas.

The New Mexico Environment Department has taken these facts into account in the creation of their proposed Air Pollution rules. However, they created two large exemptions - those for wells emitting less than 15 tons of VOC pollutants and stripper wells. Given the make-up of wells in both the San Juan and Permian Basin, our analysis estimates 95% of New Mexico's wells will be excluded from regulation under the current draft. Given the location of wells in New Mexico, these exemptions would disproportionately affect children as well as Navajo and Latino communities, which are more likely to live within a mile of a well in oil and gas producing counties. Thus, the effectiveness of these rules depends on the removal of these exemptions to effectively reduce waste, protect public health, and restore our climate.

Below we have provided a list of suggestions to strengthen NMED's draft rule:

- Pneumatic devices that help regulate fluids, pressure, and temperature are significant sources of emissions, and often fail to function correctly. Leak detection and repair requirements should extend to include these devices. Colorado adopted these requirements with the support of the largest trade associations.
- NMED should consider requirements for "zero-bleed" or zero-emission pneumatics regardless of whether a site has access to electricity. Oil and gas operators in Canada are already using solar to power these devices.
- NMED should consider monthly inspections for high producing well sites, similar to those adopted by Colorado.

Over the years, you have heard CAVU's concerns regarding methane emissions as a potent contributor to climate change. Thank you for responding to our concerns with clear and decisive action. Reducing methane emissions in New Mexico will dramatically reduce total carbon

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emissions in our state. While we are close, we are not there yet. These changes to the draft rule will be the difference in having a rule that looks nice on the books and one that secures our health and climate for decades to come.

We also thank the secretaries and staff of both agencies for their diligent hard work on this over the past year. At your direction, they have brought us a rule in a timely and inclusive process. The next step is to ensure the rule is effective.

I appreciate your time and consideration to this matter. Your efforts and leadership are paramount to the swift reduction of carbon in our state. Thank you for all you do for New Mexico - and it's people!

Very truly yours,

Jordan Vaughan Smith

Executive Director

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