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*By Environmental Improvement Board at 11:51 am, May 27, 2021*

**STATE OF NEW MEXICO  
ENVIRONMENTAL IMPROVEMENT BOARD**

IN THE MATTER OF:

CERTIFICATION FOR THE 2015 OZONE NAAQS  
TRANSPORT OR “GOOD NEIGHBOR” PROVISION  
OF THE STATE IMPLEMENTATION PLAN

No. EIB 21-05(R)

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**WILDEARTH GUARDIANS’ NOTICE OF ERRATA**

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WildEarth Guardians (Guardians) respectfully submits this Notice of Errata to correct an error in Exhibit 1, Direct Technical Testimony of Jeremy Nichols. Guardians filed its Pre-Hearing Statement and Notice of Intent to Present Technical Testimony on May 7, 2021. At page 26 of this filing, as part of Exhibit 1, the Direct Technical Testimony of Jeremy Nichols provides a table titled, “Oil and gas NOx and VOC emissions in Permian and San Juan Basin reported in Ramboll inventories.” In that table, the figures for the 2014 and 2028 VOCs in the San Juan Basin were incorrectly reversed.

That table should indicate that San Juan Basin VOC emissions in 2014 were 86,188 tons/year, and that San Juan Basin VOC emissions in 2028 were 64,429 tons/year. Accordingly, the total VOC emissions in both the Permian and San Juan Basins for 2014 should indicate 207,832 tons/year, and the total NOx emissions in both the Permian and San Juan Basins for 2028 should indicate 177,322 tons/year.

As a result of this change, the sentence prior to the table should also indicate, “While the 2011 National Emissions Inventory reported annual oil and gas industry emissions in New Mexico...the Ramboll inventory projects that by 2028, emissions of VOCs will be 40% higher than reported in 2011...”

A corrected version of this table and the sentence prior to it is provided as Attachment A in this Notice. For the convenience of the parties, Guardians also attached the Direct Technical Testimony of Jeremy Nichols with the corrections as Guardians' Corrected Exhibit 1A. Counsel apologizes for this error.

Respectfully submitted this 26<sup>th</sup> day of May, 2021,

/s/ Matthew A. Nykiel

Matthew A. Nykiel  
WildEarth Guardians  
3798 Marshall Street, Ste. 8  
Wheat Ridge, CO 80033  
[mnykiel@wildearthguardians.org](mailto:mnykiel@wildearthguardians.org)

/s/ Daniel L. Timmons

Daniel L. Timmons  
WildEarth Guardians  
301 N. Guadalupe Street, Ste. 201  
Santa Fe, NM 87501  
[dtimmons@wildearthguardians.org](mailto:dtimmons@wildearthguardians.org)

*Counsel for WildEarth Guardians*

## CERTIFICATE OF SERVICE

I certify that on May 26, 2021 I filed and served the foregoing **WILDEARTH GUARDIANS' NOTICE OF ERRATA** by electronic mail delivery to the following:

Pamela Jones,  
[pamela.jones@state.nm.us](mailto:pamela.jones@state.nm.us)  
*Board Administrator, Environmental Improvement Board*

Karla Soloria  
[ksoloria@nmag.gov](mailto:ksoloria@nmag.gov)  
*Counsel for the Environmental Improvement Board*

Andrew Knight  
[andrew.knight@state.nm.us](mailto:andrew.knight@state.nm.us)  
*Counsel for the New Mexico Environment Department*

*/s/ Matthew A. Nykiel*  
Counsel for WildEarth Guardians

## Attachment A

While the 2011 National Emissions Inventory reported annual oil and gas industry emissions in New Mexico of 127,029 tons of VOCs and 42,196 tons of NO<sub>x</sub>, the Ramboll inventory projects that by 2028, emissions of VOCs will be 40% higher than reported in 2011 and emissions of NO<sub>x</sub> will be nearly 65% higher than reported in 2011.

### Oil and gas NO<sub>x</sub> and VOC emissions in Permian and San Juan Basin reported in Ramboll inventories (in tons/year)

Basin <sup>44</sup>	2014 NO <sub>x</sub>	2028 NO <sub>x</sub>	2014 VOCs	2028 VOCs
Permian	30,351	26,473	121,644	112,893
San Juan	44,730	43,136	86,188	64,429
TOTALS	75,081	69,609	207,832	177,322

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<sup>44</sup> In the inventory, the Permian Basin was considered to include the Counties of Chaves, Eddy, Lea, and Roosevelt and the San Juan Basin was considered to include Cibola, McKinley, Rio Arriba, San Juan, Sandoval, and Valencia Counties.