

Valentine, Velvet, EMNRD

From: Davidson, Florene, EMNRD
Sent: Monday, January 4, 2021 1:58 PM
To: Valentine, Velvet, EMNRD
Subject: FW: [EXT] Regulation 7 Rulemaking (oil and gas pneumatic controllers)

Case 21528

From: Rebecca Gentry <euphoniousraconteur@gmail.com>
Sent: Monday, January 4, 2021 1:17 PM
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>
Subject: [EXT] Regulation 7 Rulemaking (oil and gas pneumatic controllers)

Dear Oil Conservation Commission:

I am writing to support Governor Michelle Lujan Grisham's call for nation-leading methane reduction rules for the oil and gas industry. Methane is the primary component of natural gas and is responsible for about 25% of the climate change we're experiencing today. Oil and gas companies release more than 1.1 million tons of methane pollution each year, which has the same climate impacts as about 25 coal-fired power plants.

To achieve the Governor's methane reduction goals, the Oil Conservation Commission must strengthen the Oil Conservation Division's proposed methane waste rules to eliminate unnecessary waste and pollution.

The final rule must achieve three key goals:

1. Ban routine venting and flaring and only allow such activities when necessary for health and safety, and require flaring over venting except when necessary for health and safety.
2. Require oil and gas companies to capture 98% of methane emissions by 2026.
3. Strengthen state reporting and public notice requirements to improve transparency and ensure accountability of oil and gas operations.

Our families need the most comprehensive protections so we urge the Oil Conservation Commission to do the following:

- Require "green completions" to minimize methane emissions during completions and recompletions.
- Toughen provisions to ensure that flares stay lit and work properly at all times.
- Require operators to immediately notify persons and communities at risk when methane releases threaten public health, safety, or the environment occur.
- Deny permits to drill new wells if operators are out of compliance with gas capture requirements.
- Prohibit routine venting and flaring during pipeline maintenance and repairs and only allow for flaring if necessary for safety.
- Ensure that any leaks or repairs through the ALARM program are verified by an independent third party to ensure the integrity of the program.

Finally, since nearly 70% of oil and gas methane pollution in New Mexico occurs through leaks, it is critical that the New Mexico Environment Department adopt a rule that holds polluters accountable and cuts emissions across the oil and gas supply chain. NMED's draft rule fails to protect public health and our climate by exempting 95% of wells from regulation across the state from oversight and basic leak detection and repair requirements. The Commission should make clear that the agencies must work in parallel to achieve comprehensive rules that cut methane and air pollution.

Sincerely,
Rebecca Gentry
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Albuquerque, NM 87108