

## Valentine, Velvet, EMNRD

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**From:** goodbarjr@gmail.com  
**Sent:** Saturday, January 2, 2021 1:43 PM  
**To:** Davidson, Florene, EMNRD  
**Subject:** [EXT] New comment for hearing from MM site

### Name

James Goodbar

### Email

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### Add your comment here

Comments on NMOCD Proposed Rule Making for Natural Gas Flaring and Venting:

I am James Goodbar, a resident of Carlsbad for the past 44 years. I retired from the Bureau of Land Management after 38 years of service in the Carlsbad BLM Field Office. Much of my career involved working closely with the oil and gas industry citing well locations and infrastructure such as pipelines, compressor sites, tank batteries and frac tanks. I also developed new drilling, casing and cementing requirements and other best management practices, stipulations and conditions of approval to protect fragile environments.

Thank you for the opportunity to comment on the NMOCD proposed rulemaking for natural gas flaring and venting. I congratulate NMOCD for their action in updating and strengthening the previous rules and support Governor Michelle Lujan Grisham's initiative to develop nation-leading methane rules.

It is crucial for New Mexico's economic stability, public safety and long-term environmental health that the NMOCD to pass stricter rules for venting and flaring our natural gas.

The final rules should stop routine venting and flaring of natural gas except in rare health and safety instances that are approved by NMOCD. Vented or flared gas is not metered and therefore the people of New Mexico are not getting royalties for our natural resources and the government is not collecting the revenues it should. Additionally, it is a huge contributor to greenhouse gas emissions that is degrading our natural environment and the health and welfare of our citizens.

In conjunction with this, more strict requirements for leaking storage tanks and pipelines need to be put in place. The technology to install vapor recovery systems and leak detection systems has already been developed and is currently available. With 80% or more of the production revenue going to the industry they can afford to do what is right for the health and wellbeing of New Mexico's people and environment. The goal of oil and gas companies to capture 98% of methane emissions by 2026 is not unreasonable and should be required.

Companies that do not meet the requirements of methane emissions should not be allowed to drill new wells until all their tanks, pipelines, facilities, and appurtenances have been monitored and are in compliance with all the new emission standards. Not doing so allows poor performing companies to continue to waste our natural resources and we will not achieve our goals of cleaner air, better health and a more stable and sustainable economy for the citizens of New Mexico.

Thank you for making our state a more enchanting and healthy place to be proud of.

Respectfully submitted:

James Goodbar  
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Carlsbad, New Mexico

### Are you interested in making a public statement at the hearing?

- No, I do not want to sign up to make a public statement