Valentine, Velvet, EMNRD

From: Davidson, Florene, EMNRD

Sent: Tuesday, January 5, 2021 9:16 AM

To: Valentine, Velvet, EMNRD

Subject: FW: City of Artesia Methane Rule Letter **Attachments:** Oil Conservation Committee letter.pdf

Case 21528

From: Lisa Waller <LWaller@artesianm.gov> Sent: Tuesday, January 5, 2021 7:59 AM

To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>

Subject: [EXT] City of Artesia Methane Rule Letter

Good morning. I hope all finds you well in this new year. Attached please find the letter from the City of Artesia New Mexico regarding the proposed methane emissions ruling.

Mayor Miller has asked that I forward this to your attention.

The original letter will be placed in the mail today.

Please let me know if you should require any additional information from us.

We appreciate everything you do.

Thank you and take care.

Lisa A Waller Executive Assistant City of Artesia P.O. Box 1310 Artesia, NM 88211-1310 (575)748-8282



THE CITY OF ARTESIA NEW MEXICO

511 W. TEXAS AVENUE (575) 746-3593 MAYOR PO Box 1310 (575) 746-2122 CITY CLERK ARTESIA, NM 88211-1310 (575) 746-3886 FAX

January 4, 2021

Oil Conservation Commission Florene Davidson, Clerk 1220 South St. Francis Drive Santa Fe, NM 87505

Dear Members of the Oil Conservation Commission,

I strongly support a methane rule that will position New Mexico as a leader in the reduction of emissions, while preserving the long term success of our state's oil and gas industry. I had the opportunity to listen to a BLM staffer several years ago who had spent considerable time researching government data regarding emissions relating to oil and gas from producing countries around the world and in the United States of America. The conclusion was that production of oil and gas, at that time, from the United States produced less emissions into the atmosphere than a barrel of oil or an mcf of gas produced anywhere else in the world. As a result, I would hope that while our country and the rest of the world continues to use oil and gas for energy, that we would not regulate our domestic industry out of business and thereby import oil and gas that has greater emissions into the atmosphere than would have resulted if we produced it domestically. Since the time that data was gathered, our domestic industry has made great strides at reducing our emissions even more. The State of New Mexico can and should work to achieve a balance between mitigating risks associated with climate change and ensuring the continued strength of oil and gas as the state's largest and most successful private industry.

While the rule seeks to be a leader in emission reduction, we need to have balance and flexibility such that older marginal well reserves are not lost by costs that result in them being uneconomical while the resulting reduction in emissions is nominal. We also need the state to encourage other government bodies who permit rights of ways and other aspects of the business to not be an impediment to timely approval of projects which the delays result in additional emissions that could have been avoided. The final rules must preserve a balance between bold, meaningful steps forward on climate change and smart, flexible regulations that ensure the oil and gas industry will continue to thrive in New Mexico.

Oil and gas production provides significant employment and tax revenue to the State of New Mexico. Many point to the growth of renewables in our state, but while we still need oil and gas for energy in the world economy, we should try and maximize our lower emission product which provides huge financial benefit to the state. New Mexico can be a leader in the fight against climate change and the production of oil and gas.

The Commission should adopt a regulation that allows policymakers to take strong steps forward in the fight against climate change while continuing to support economic growth and job creation in the oil and gas sector. Through the leadership of this Commission, New Mexico can show the rest of the nation how to reduce emissions in the oil and gas industry and promote problem-solving and creativity to ensure the industry continues to serve as the backbone of our state's economy.

Sincerely,

Mayor Raye Miller

Though miller

Artesia, NM