

Valentine, Velvet, EMNRD

From: Davidson, Florene, EMNRD
Sent: Friday, January 8, 2021 12:21 PM
To: Valentine, Velvet, EMNRD
Subject: FW: Methane hearing comments - National Parks Conservation Association
Attachments: Methane hearing comments NPCA (01_04_2021) (1).docx

Case 21528

From: Emily Wolf <ewolf@npca.org>
Sent: Friday, January 8, 2021 11:48 AM
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>
Subject: [EXT] Methane hearing comments - National Parks Conservation Association

Hi Florene,

I gave oral testimony on Monday and have attached a written version of my comments with sources cited/linked.

Thanks very much and have a great weekend!

Emily

Methane hearing comments – National Parks Conservation Association

Strong rules to mitigate methane emissions are absolutely crucial for the state to develop and implement, setting the stage for other states and communities to adopt to reduce waste and safeguard public health, our climate and ecosystem, and the unique and fragile landscapes in and connected to our national parks.

The health of communities is severely impacted by the pollutants generated from oil and gas industrial practices in New Mexico, particularly in the San Juan and Permian Basins. Degraded air quality from methane and volatile organic compounds – which are released along with methane in the oil and gas extraction processes – damage the fragile ecosystems in the Greater Chaco and Greater Carlsbad Landscapes. VOCs have been identified as contributing greatly to adverse effects to human health, detrimental ecosystem effects in parks, and visibility degradation

Methane emissions contribute to climate change that is putting park visitors, wildlife, and cultural and natural resources at risk. Oil and gas facilities release billions of cubic feet of methane into the atmosphere every year, wasting energy and money. Companies operating on federal and tribal lands alone are wasting an estimated \$330 million nationwide each year through leaks, venting and flaring.¹

Carlsbad Caverns and Guadalupe Mountains National Parks combined generated over \$53 million in local economic output and supported 655 jobs in 2017, but unrestrained and poorly planned industrial development can have a negative impact on this stable and sustainable economy. At Carlsbad Caverns, from 1993 to 2016 visitation decreased from 690,000 to 470,000, more than 30%.²

A 2018 study out of Cornell/Iowa showed that park visitation drops 8% or more when pollution is high.³

Without strong rules, there will be a gut punch to local economies which depends on those visitors. We commend the OCC for their good progress toward a strong rule, but request that the final rule contains the following: requiring “green completions” to minimize methane emissions during completions and recompletions; require operators to immediately notify persons and communities at risk from methane venting; deny permits for 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

¹ http://blogs.edf.org/energyexchange/2015/06/23/big-oil-and-gas-emissions-out-west-new-report-sizes-methane-problem-on-federal-and-tribal-lands/?_ga=1.65865262.122620674.1415990458

² (Lund, N. (2017). Out of Balance: National Parks and the Threat of Oil and Gas Development. Washington, DC: National Parks Conservation Association. Available at: <https://www.npca.org/resources/3205-oil-gas-leasing-threatens-7-western-national-parks>)”

³ Keiser, David & Lade, Gabriel & Rudik, Ivan. (2018). Air pollution and visitation at U.S. national parks. Science Advances. 4. eaat1613. 10.1126/sciadv.aat1613.

any leaks or repairs through the ALARM program are verified by an independent third party to ensure the integrity of the program.

The "Air Quality Resource Values" or AQRVs, are parks' identified lists of values they're worried about being impacted by pollution - including dark skies and ecosystems.⁴ Not only will a strong methane rule from the OCC prevent waste, it will safeguard these values by adequately regulating this pollution. Combined, according to the National Park Service, more than 4000 after dark visitor contacts are recorded annually at Chaco Culture National Historical Park⁵, Guadalupe Mountains, and Carlsbad Caverns combined. Sky glow adversely impacts nighttime scenic quality and visual resources by inhibiting park visitors' ability to view celestial objects. Disruption of the natural cycles of light and dark also have detrimental effects on wildlife, including bats and the insects on which they feed. Bright flaring operations less than 10 miles from Carlsbad and Chaco are often easily discernible.

It is vital to defend national parks by mitigating the emission of methane on a state level as well as nationwide. As climate change progresses, national parks are disproportionately at risk⁶, simultaneously becoming even more important sanctuaries for plants and animals, as well as fostering wildlife corridors, healthy watersheds, and community-scale protections.⁷

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⁴ [https://www.nps.gov/articles/aqrv-assessment.htm#:~:text=Air%20quality%20related%20values%20\(AQRVs,%2C%20ecological%2C%20or%20recreational%20resource.&text=particles%20affecting%20visibility%2C%20and](https://www.nps.gov/articles/aqrv-assessment.htm#:~:text=Air%20quality%20related%20values%20(AQRVs,%2C%20ecological%2C%20or%20recreational%20resource.&text=particles%20affecting%20visibility%2C%20and)

⁵

<https://www.nps.gov/chcu/planyourvisit/nightsky.htm#:~:text=Over%203%2C000%20visitors%20and%20school,to%20image%20deep%2Dspace%20objects>.

⁶ Patrick Gonzalez *et al* 2018 *Environ. Res. Lett.* **13** 104001

⁷ <https://www.washingtonpost.com/energy-environment/2018/09/25/climate-change-is-destroying-our-national-parks-an-alarming-rate-study-finds/>