

Valentine, Velvet, EMNRD

From: patsheely@gmail.com
Sent: Monday, January 4, 2021 7:22 PM
To: Davidson, Florene, EMNRD
Subject: [EXT] New comment for hearing from MM site

Name

Patricia Sheely

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Add your comment here

RE: Public Comment on OCC Methane Venting and Flaring Hearing

Dear Members of the Oil Conservation Commission,

Thank you for the opportunity to provide a comment.

My name is Patricia Sheely. I have lived in Gallup, NM, for the past 27 years. I am retired from working at Gallup Indian Medical Center as a Clinical Dietitian.

I am writing as a person of faith with strong moral convictions to care for my neighbors and God's creation. I grew up on a farm in Ohio and developed a closeness to the earth as I played in the woods and in the stream that ran through our farm. I love the New Mexico landscape and sunshine and made the decision to retire here.

I support Governor Michelle Lujan Grisham's call for nation-leading methane rules. To achieve that goal, I support the efforts of the Oil Conservation Commission which has created good rules but suggest some ways to strengthen the rule.

As a citizen, I believe it is important to share my concerns which begin with the health of our children and how the present climate crisis is affecting and will affect their health, the health of future generations, and all of earth's plant and animal life.

Asthma occurs due to exposure to dust and air pollution. The number of children suffering from asthma has increased. Those children living near oil and gas wells are suffering at an even greater rate. Children have smaller airways than adults, which makes asthma especially serious for them. Asthma affects them through dependence on medication, limitations in their physical and social activities, difficulty concentrating, and feeling different from their peers. This is a chronic disease that sensitizes their airways for life.

Another problem that I am particularly concerned about is the health of childbearing age women and the effect of both high temperatures and air pollution on a woman's ability to have a healthy pregnancy. It is common sense that pregnancy would be affected by the environment, but we are only now acknowledging its importance on pregnancy outcomes. Our future depends on caring for infants and children.

Our indigenous peoples are particularly at risk from the pollution caused by oil and gas wells because they are the ones who live the closest to the wells. They have been sorely impacted by COVID-19 in part due to their impaired health status which has been affected by pollution.

Even though I have planted native, drought resistant flowers and shrubs in my backyard, many died this past summer due to the intense heat. The high temperatures are drying our soils and the plants' transpiration rates are increasing. This sum of evaporation and transpiration (evapotranspiration) has increased resulting in the death of my plants. Our temperatures are only going to rise in the future stressing both plant life and animal life.

So for me global warming and the climate crisis is of paramount importance. Methane is a major contributor to the climate crisis and rising temperatures. Methane is the principal component of natural gas and responsible for 25% of climate change. New Mexico has the worst methane pollution in the United States. The leaks equal 25 coal-fired power plants! This number is increasing. When I spoke about this in August 2020, the number was 22 power plants. We cannot be proud that the large methane cloud that can be seen from space hangs over the Four Corners Area.

Not only is our children's health put at risk by pollution, as a state we depend on oil and gas revenue to fund our education

system. Too often the argument is put forth that nothing can be done to curtail the oil and gas industry because we depend on the revenue. Each year, oil and gas companies waste \$271 million worth of natural gas through venting, flaring, and leaks which costs the state over \$43 million in royalty and tax revenue that could fund public education and other critical services. To allow methane to be vented, flared, or leaked is wasteful as well as polluting.

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.

The Oil Conservation Commission could improve the proposed methane waste rule by:

- Toughening provisions to ensure that flares stay lit and work properly at all times, preventing methane from being vented into the atmosphere.
- Requiring operators to immediately notify persons and communities at risk when methane releases that threaten public health, safety, or the environment occur.
- Denying permits to drill new wells if operators are out of compliance with gas capture requirements. Operators should be required to invest first in complying with their legal requirements to prevent methane waste and pollution before they drill new wells.
- Ensure that any leaks or repairs through the ALARM program are verified by an independent third party to ensure the integrity of the program.
- 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. Exempting 95% of wells from regulation is not acceptable.

I support Governor Michelle Lujan Grisham's call for nation-leading methane rules. To achieve that goal, the Oil Conservation Commission must strengthen the Oil Conservation Division's proposed methane waste rules to eliminate unnecessary methane waste. I would like to see New Mexico lead in the effort to curb greenhouse gas emissions.

Thank you for your attention to my concerns.

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

- Yes, I plan to sign up to make a public statement