

Valentine, Velvet, EMNRD

From: Hearings, OCC, EMNRD
Sent: Tuesday, January 5, 2021 8:01 AM
To: Valentine, Velvet, EMNRD
Subject: Fw: [EXT] Methane regulations

Case 21528

From: Timothy Peterson <petersontimpaul@gmail.com>
Sent: Monday, January 4, 2021 11:57 AM
To: Hearings, OCC, EMNRD
Subject: [EXT] Methane regulations

Hello. My name is Timothy Peterson. I live in Albuquerque. I have lived here since 1972. I am 68 years old. I want to thank the Oil Conservation Commission for the opportunity to send a written comment. This month the Commission will hear the major arguments for enacting regulations to curb methane pollution and waste—air pollution, public health, climate impacts, lost tax revenue. All are valid. To that list I would like to add two points for consideration.

First, the decisions made by the Commission this month will affect not just us, but our children and grandchildren. If we think about our own parents and grandparents, we will recall that they planned and prepared so that we might live better lives than they. They set an example for us, an example to follow. Second, if the state of New Mexico strengthens its methane requirements—particularly a requirement that oil and gas facilities capture 98 percent of natural gas emissions by 2026—that will be a first step, a step in a process that will incentivize the oil and gas industries to develop alternative ways of operating. Stronger requirements won't hurt the oil and gas industries. Rather, they will motivate those industries to rethink their practices.

Let me illustrate with a short example.

Back in 1985 scientists discovered a hole in the ozone layer above the Antarctic. The source was determined to be chlorofluorocarbons—the chemicals used in refrigerants. That led to an international effort that resulted in the Montreal Protocol of 1987, an agreement to phase out CFCs and to develop alternative technologies. The Montreal Protocol incentivized industries to develop alternative ways of doing business. And the industries did just that. They found solutions. The solutions worked. And today we are well on our way to recovery of the ozone layer.

It didn't happen all at once. The Montreal Protocol was just a first step. But it led to a second step, which led to a third. The first step was taken 33 years ago.

Today, if Oil Conservation Commissioners decide to take a first step by strengthening the Division's methane waste rules, that will lead to the next step. The oil and gas industries will be incentivized to develop alternative ways of dealing with methane waste. And they will do it.

It won't be simple. It won't happen overnight. But it will happen, because it is the right thing to do. Right for our children. Right for our grandchildren. Right because it follows the example set for us by our parents and grandparents and by the authors of the Montreal Protocol.

Thank you.