

Valentine, Velvet, EMNRD

From: Davidson, Florene, EMNRD
Sent: Friday, January 8, 2021 6:22 AM
To: Valentine, Velvet, EMNRD
Subject: FW: [EXT] Transcript of public comment at OCC hearing 1/4/21...

Case 21528

From: Jacqueline Goveas <jacgove@yahoo.com>
Sent: Thursday, January 7, 2021 6:11 PM
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>
Subject: [EXT] Transcript of public comment at OCC hearing 1/4/21...

Dear Ms. Davidson,

I am submitting a transcript of my public comment at the OCC Hearing on 1/4/21 below.

Thank you,
Jacqueline Goveas

My name is Jacqueline Goveas and I am a resident of Las Cruces. I am speaking as an individual. I'd like to thank the Oil Conservation Commission for giving me an opportunity to make a comment today.

New Mexico doesn't regulate methane waste, even though methane release contributes 25% to climate change.

This is a critical time that needs a strong rule on methane waste: the latest data from the Permian reveal the highest methane levels ever measured for a U.S. oil and gas basin. And with the recent drop in oil prices, companies are more likely to cut corners on environmental protection.

Methane waste represents an economic loss. Industrial venting, flaring and leaks add up to \$270 million in natural gas a year, which could be used as state royalties and tax revenue for public education and services.

Governor Lujan-Grisham's directive on methane is trailblazing. However, the current Oil Conservation Division's proposed methane waste rules must be strengthened: by banning methane waste and holding companies accountable.

Venting and flaring must both be banned.

1. Green completions should be required when a well is being prepared for production: so gas should be captured at the wellhead instead of being released into the atmosphere or flared.
2. Routine venting and flaring during pipeline maintenance and repair should be prohibited.
3. When gas release is necessary for safety reasons, only flaring should be only be used, not venting, and provisions should be toughened to make sure flares stay lit and working properly at all times.

4. A 5-year target should be set: companies should capture 98% of methane by 2026.

Second, companies need to be held accountable for methane release.

1. Permits to drill new wells should be denied if operators are not compliant with gas capture requirements.
2. Third party verification should be required for leaks or repairs made through the ALARM program. Although leaks cause 70% of oil and gas pollution, the current draft rule exempts 95% of wells from regulations on oversight and basic leak detection and repair.
3. Last but not least, operators must be required to notify persons and communities at risk from a methane release. Transparency should be improved through state reporting and public notices.

Please adopt a strong rule to protect our health and the environment that supports us all. Thank you for your time.