

Valentine, Velvet, EMNRD

From: Davidson, Florene, EMNRD
Sent: Friday, January 8, 2021 7:42 AM
To: Valentine, Velvet, EMNRD
Subject: FW: [EXT] OCD Methane Rule - Comments
Attachments: OCD Comment Letter_T. Seamster.pdf

Case 21528

From: Teresa Seamster <ctc.seamster@gmail.com>
Sent: Friday, January 8, 2021 7:41 AM
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>
Subject: [EXT] OCD Methane Rule - Comments

Dear Florene Davidson,
Please accept the attached written comments on the hidden impacts of greater air pollutant exposure (including methane) on residents living near gas and oil wells in the San Juan basin.

Many thanks,
Teresa Seamster

Draft Methane Rule Comments to EMNRD – Oil Conservation Division

January 4, 2021

To OCD Commissioners:

Thank you Commissioners.

My name is Teresa Seamster. I am a member of the Counselor Chapter Health Committee in the Tri-Chapter area of the Navajo Nation .

We formed the committee 5 years ago to document local health symptoms, air pollution complaints and public safety concerns caused by a sharp increase in well flaring, well explosions, oil and contaminated water leaks, and oil truck and tanker collisions with local vehicles and US550 traffic on the chapter's northern boundary.

Our 2019 Health Impact Assessment recorded resident health symptoms and PM 2.5 air monitoring at 8 residential chapter sites with sampling at 4 related sites for 75 VOCs, Hydrogen Sulfide and Formaldehyde. Our air pollutant findings were significantly worse in several areas than those of thousands of monitored sites in oil patch communities in Pennsylvania, Wyoming, California, New York and Ohio who submit their data to the national Environmental Health Project.

One example was elevated levels of formaldehyde (a potent carcinogen which researchers use as an indicator near well sites that other toxic chemicals are likely present). This gas was detected at all sites well above the USEPA threshold for mitigation of 0.003 ppm. (Our sampling range was 0070 to .0097 ppm). Dangerous spikes in formaldehyde exposure are completely missed by state and federal AQ monitoring because it doesn't last long in the atmosphere, which takes us to the issue of trying to control the mixture of chemicals that people are being exposed to that are not revealed in collected statistics.

The Physicians for Social Responsibility (PSR) publishes an annual **Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking**. These published findings catalog thousands of specific studies, clinical reports and reported incidents of harm directly caused by US fracking operations, which the PSR has called the “greatest uncontrolled health experiment ever seen of outdoor industrial pollution on the American public.”

The impact of unregulated methane emissions as a potent indicator of rural air pollution has become clear due to recent FLIR technology , and despite steeply lowered production, NM greenhouse gas emissions – especially methane – are still expanding.¹

Even with almost no regulation of emissions - due to gross over extraction, and the extremely high cost of fracking, shale oil is an industry that has never returned a net

profit. U.S. shale has lost \$300 billion over the last 15 years—according to a study by the international accounting firm Deloitte.² Likewise, *Petroleum Economist* has predicted a steep slump in shale gas production extending into 2021.

With an economic lifespan of between 30 and 50 years, new gas infrastructure projects are now at risk of becoming stranded assets. Evidence shows that continuing investments in fossil fuel exports may substantially harm the U.S. economy.³

That economic harm and long-term impact on residents' health in the San Juan Basin has already hit New Mexico.

Effective methane regulation is a decade overdue. There is an escalating health price tag connected to it. Adult and childhood asthma cases have doubled and respiratory illness has become a leading cause of death in the rural eastern Navajo Nation. And, the still rampant spread of Covid cases in Navajo communities has exposed the real cost of ignoring these largely hidden and unmonitored sources of dangerous air pollution.

Thank You.

Teresa Seamster, MS, EDS
Counselor Chapter Health Committee
505-466-8964
ctc.seamster@gmail.com

Endnotes

¹ Howarth, R. W. (2020). Methane emissions from fossil fuels: Exploring recent changes in greenhouse-gas reporting requirements for the State of New York. *Journal of Integrative Environmental Sciences*. Advance online publication. doi: 10.1080/1943815X.2020.1789666

² Cunningham, N. (2020, June 23). U.S. shale has lost \$300 billion in 15 years. *Oilprice.com*. Retrieved from <https://oilprice.com/Energy/Energy-General/US-Shale-Has-Lost-300-Billion-In-15-Years.html>

³ Mercure, J.-F., Pollitt, H., Viñuales, J. E., Edwards, N. R., Holden, P. B., Chewpreecha, U., . . . & Knobloch, F. (2018). Macroeconomic impact of stranded fossil fuel assets. *Nature Climate Change*, 8, 588-593. doi: 10.1038/s41558-018-0182-1

Attachment

Concerned Health Professionals of New York, & Physicians for Social Responsibility. (2020, December). Compendium of scientific, medical, and media findings demonstrating risks and harms of fracking (unconventional gas and oil extraction) (7th ed.). <http://concernedhealthny.org/compendium/>