

Valentine, Velvet, EMNRD

From: Davidson, Florene, EMNRD
Sent: Friday, January 8, 2021 10:12 AM
To: Valentine, Velvet, EMNRD
Subject: FW: [EXT] Outdoor Recreation Business Letter Urges Improvements to Methane Rule Making Process
Attachments: Methane Letter From Outdoor Recreation Industry (January 8, 2021) .docx; ATT00001.htm

Case 21528

From: Jeffrey Thrope <jeff@publiclandsolutions.org>
Sent: Friday, January 8, 2021 9:53 AM
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>
Subject: [EXT] Outdoor Recreation Business Letter Urges Improvements to Methane Rule Making Process

Florene,

Please find the attached letter from New Mexico outdoor businesses urging NMED and OCD to improve their methane and air quality proposals to meet Governor Michelle Lujan Grisham's goals. [New Mexico's outdoor recreation industry could be the key to our state's economic recovery from Covid-19](#), but if our air is dirty, people will not hiking in our deserts, kayak in our rivers or bike in our mountains. We ask that you help us protect our public lands so that future generations may enjoy them as much as we do.

Thank you,

Jeff Thrope
Public Land Solutions
[847-721-2408](tel:847-721-2408)

January 8th, 2020

Florene Davidson
Commission Clerk
Administration and Compliance Bureau, Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Dear Florene Davidson,

To keep our air clean and protect the outdoor recreation businesses that are core to the New Mexican economy, we need strong rules to reduce air and climate pollution. We urge NMED and OCD to improve their methane and air quality proposals to meet the Governor's goals and protect our businesses. As we all dig out of the current economic crisis, it's more important now than ever to maintain New Mexico's iconic outdoor brand and continue to grow clean jobs in our outdoor recreation industry.

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.

New Mexico has a methane waste and oil and gas air pollution problem, and it's causing harm to the state's unique outdoor recreation brand by ruining our air and harming our climate. Methane is a powerful climate change pollutant responsible for 25 percent of the warming we experience today, and New Mexico is a primary source of our nation's methane pollution. While we work to promote our unique cultural heritage along with our hiking, biking, fishing, skiing, and rafting along with many other outstanding outdoor activities, New Mexico is increasingly known as the nation's leading methane hotspot.

The *2020 New Mexico Climate Strategy: Progress and Recommendations* report revealed that the oil and gas sector generates 53% of all greenhouse gas emissions in the state, more than twice the amount than previously estimated.

Critically, the *Climate Strategy* report finds that "Our current and proposed climate strategies will make a significant dent in our greenhouse gas emissions profile by 2030—**but reaching our targets will require renewed ambition and additional action.**"

To achieve these goals, the Oil Conservation Commission should:

- Require "green completions" to minimize methane emissions during completions and recompletions.
- Toughen provisions to ensure that flares stay lit and work properly at all times, preventing methane from being vented into the atmosphere.
- Require operators to immediately notify persons and communities at risk when methane releases threaten public health, safety, or the environment occur.

- Deny 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.
- Prohibit routine venting and flaring during pipeline maintenance and repairs and only allow for flaring if necessary for safety.
- Ensure that any leaks or repairs through the ALARM program are verified by an independent third party to ensure the integrity of the program. While voluntary ALARM holds promise in incentivizing technological innovations, these programs are not a substitute for mandatory leak detection and repair requirements, the most important tool for reducing methane leaks.

Finally, 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. NMED's draft rule fails to protect public health and our climate by exempting 95% of wells from regulation across the state from oversight and basic leak detection and repair requirements. The Commission should make clear that the agencies must work in parallel to achieve comprehensive rules that cut methane and air pollution.

Thank you for your time,

Jay Carroll
El Rey Court
Santa Fe, NM

Van Beachment
Solitary Angler
Taos, NM

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Farewell Climbing
Santa Fe, NM

Jacob Clemens
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Jeff Thrope
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