

Valentine, Velvet, EMNRD

From: Davidson, Florene, EMNRD
Sent: Friday, January 8, 2021 12:21 PM
To: Valentine, Velvet, EMNRD
Subject: FW: CEA Comments on Venting & Flaring
Attachments: Venting & Flaring Comments to NMED -- CEA-NM (1.8.21).pdf

Case 21528

From: Matt Gonzales <mgonzales@consumerenergyalliance.org>
Sent: Friday, January 8, 2021 11:47 AM
To: Davidson, Florene, EMNRD <florene.davidson@state.nm.us>
Subject: [EXT] CEA Comments on Venting & Flaring

Commission Clerk Davidson:
Thank you for the opportunity to comment on this matter. Our comment letter is attached.

Matthew E. Gonzales
State Director
Consumer Energy Alliance - New Mexico
P.O. Box 524
Cimarron, NM 87714
C: 505.203.3028
E: mgonzales@consumerenergyalliance.org
W: www.consumerenergyalliance.org

About CEA:

Consumer Energy Alliance advocates for affordable, reliable, and safe energy policies that support a variety of energy consumers across the country. From families to businesses large and small, we're the voice of the energy consumer.

Learn more about CEA- New Mexico [here](#). Click the "Join" tab to receive our updates.

January 8, 2021

Oil Conservation Commission
Florene Davidson, Clerk
1220 South St. Francis Drive
Santa Fe, New Mexico, 87505
florene.davidson@state.nm.us

RE: The proposed rules regulate the venting and flaring of natural gas from oil and natural gas production and gathering facilities.

Dear Members of the Oil Conservation Commission:

Consumer Energy Alliance – New Mexico (CEA-NM) submits these comments on behalf of our statewide membership and more than 550,000 members nationwide. CEA-NM’s mission is to help ensure American families and businesses have access to reliable, affordable energy based on balanced policy choices that protect our environment and natural resources. We believe in an environmentally sustainable energy future – built with the power of traditional and renewable resources to create the best mix for families and businesses, our environment and our economy. I write you today to express our strong support for a methane rule that will position New Mexico as a leader in the fight against climate change, while preserving the long-term success of the State’s oil and gas industry that underpins so much of the livelihood of our communities, schools and essential services.

CEA supports actions that thoughtfully advance our nation and states towards a cleaner, more environmentally responsible energy future. We believe that responsible policies should always consider the needs of consumers while leveraging and supporting the development of state-of-the-art technologies and modernized regulatory structures to improve our environmental stewardship, aiding in better air quality and the reduction of greenhouse gas emissions.

The State of New Mexico can and should work to achieve a balance between mitigating risks associated with harmful emissions and ensuring the continued strength of oil and gas as the state’s largest and most successful private industry. For example, the 98% gas capture requirement is ambitious and challenging, it preserves the desire to implement a nationally leading rule, and can be achieved if the appropriate operational flexibilities are provided. The final rules must maintain this balance between bold, meaningful steps forward on climate change and smart, flexible regulations that ensure the oil and gas industry will continue to thrive in New Mexico.

As we all know, oil and natural gas production is the foundation of New Mexico’s economy, and it is important that the state’s proposed methane rules allow the industry to grow, create jobs, attract investment, and provide critical funds for our state budget and public schools. The oil and gas industry, along with its associated direct and indirect jobs and tax revenue streams fund major portions of the budgets of our local governments, community colleges, public schools and infrastructure projects around New Mexico. New Mexico can be a leader in the fight against climate change and the production of oil and gas. The two are not mutually exclusive.



The Commission should adopt a regulation that allows policymakers to take strong steps forward in the fight against climate change while continuing to support economic growth and job creation in the oil and gas sector. Through the leadership of this Commission, New Mexico could show the rest of the nation how to reduce emissions in the oil and gas industry and promote problem-solving and creativity to ensure the industry continues to serve as the backbone of our state's economy for years to come.

Thank you again for the opportunity to comment on this important matter.

Sincerely,
Matthew E. Gonzales
State Director

Consumer Energy Alliance – New Mexico
PO Box 524
Cimarron, NM 87714
mgonzales@consumerenergyalliance.org
(505)203-3028