From:	Giese, Michele, DOH
To:	Methanestrategy, NM, NMENV; WasteRule, EMNRD, EMNRD
Subject:	Comments on DRAFT Rules
Date:	Friday, August 28, 2020 9:13:30 AM
Attachments:	image002.png image003.png image004.png image005.png

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To Whom it May Concern,

Here are my comments regarding the DRAFT Rules:

For the New Mexico Environmental Department: Please remove loopholes that would exempt the vast majority of wells from leak detection and repair. This is unacceptable. Please remove the exemption for stripper wells and the 15 tons per pollution threshold for volatile organic compounds.

For the Energy, Minerals, and Natural Resources Department: Please set the requirement for gas capture by locality either by county or basin. If not, companies operating in multiple localities could just elect one locality and disproportionately affect one or the other basins in NM and will not reach the 98% capture goal set by the NM Oil Conservation Division.

Thank you
-Michele

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NEW MEXICO DEPARTMENT OF HEALTH

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