From: Patricia Sheely
To: Methanestrategy, NM, NMENV; WasteRule, EMNRD, EMNRD
Subject: [EXT] Public Comment on NMED and EMNRD Draft Ozone Precursor and Methane Rule
Date: Friday, August 28, 2020 11:51:49 AM
Attachments: Methane Rule Letter 8-28-20.docx

August 28, 2020

Liz Bisbey-Kuehn
NMED Air Quality Bureau
525 Camino de los Marquez
Santa Fe, NM 87505

RE: Public Comment on NMED and NM EMNRD Draft Ozone Precursor and Methane Rule

Dear Ms. Bisbey-Kuehn and Members of NMED, NM EMNRD and Methane Advisory Panel,

Thank you for the work that you have done drafting the Ozone Precursor Emissions Rules, and thank you for the opportunity to participate in the process of reviewing and finalizing these rules. I appreciate that the Governor has committed to adopting nation-leading oil and gas rules to cut methane and VOC air pollution.

My name is Patricia Sheely and I have lived in Gallup, NM, for the past 27 years. I am retired from working at Gallup Indian Medical Center as a Clinical Dietitian.

I am writing because I am a person of faith with strong moral convictions to care for my neighbors and God's creation.

I am very concerned about the health of our children and how the present climate crisis is affecting and will affect their health, the health of future generations, and all of earth's plant and animal life.

Asthma occurs due to exposure to dust and air pollution. The number of children suffering from asthma has increased. Those children living near oil and gas wells are suffering at an even greater rate. Children have smaller airways than adults, which makes asthma especially serious for them. Asthma affects them through dependence on medication, limitations in their physical and social activities, difficulty concentrating, and feeling different from their peers. This is a chronic disease that sensitizes their airways for life.

Another problem that I am particularly concerned about is the health of childbearing age women and the effect of both high temperatures and air pollution on a woman's ability to have a healthy pregnancy. It is common sense that pregnancy would be affected by the environment, but we are only now acknowledging its importance on pregnancy outcomes. Our future depends on caring for infants and children.

Our indigenous peoples are particularly at risk from the pollution caused by oil and gas wells

because they are the ones who live the closest. They have been sorely impacted by COVID-19 in part due to their impaired health status which has been affected by pollution.

Even though I have planted native, drought resistant flowers and shrubs in my backyard, many have died this summer due to the intense heat. The high temperatures are drying our soils and the plants' transpiration rates are increasing. This sum of evaporation and transpiration (evapotranspiration) has increased resulting in the death of my plants. Our temperatures are only going to rise in the future stressing both plant life and animal life.

So for me global warming and the climate crisis is of paramount importance. Methane is a major contributor to the climate crisis and rising temperatures. Methane is the principal component of natural gas and responsible for 25% of climate change. New Mexico has the worst methane pollution in the United States. The leaks equal 22 coal-fired power plants! We cannot be proud of the large methane cloud that hangs over the Four Corners Area.

Not only is our children's health put at risk by pollution, as a state we depend on oil and gas to fund our education system. To let methane be vented, flared, or leaked is wasteful, losing the state much needed money.

Thank you for working to develop rules that address methane waste and trying to right the wrong that New Mexico has no requirements prohibiting methane waste release. This shows an effort to reach Gov. Lujan Grisham's commitment to adopting nation-leading oil and gas rules to cut methane and air pollution.

The OCD rules are good, but need to be better. Leak detection and repair requirements should be expanded. There needs to be more timely inspections with automatic triggers that allow OCD to take action. The state needs to be able to enforce the rules or companies will not be motivated to comply with the rules. We need to know how many people are needed to adequately inspect wells and pipelines and then to provide for this in the budget. The amount of income from captured methane will help us to do this.

Given the well-documented history of widespread venting and flaring reporting noncompliance, OCD should require companies to contract with independent third-party verification to ensure the integrity of venting and flaring data that is reported to the agency. Since venting is damaging to the climate, it should be banned except for emergencies. Flaring should only occur when absolutely necessary to protect health and safety. I will let others who are more knowledgeable comment on the details.

I ask that ENMRD 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. This would disproportionately affect Navajo and Latino communities. The goal that 98% of all gas be captured is an appropriate goal. Regarding the NMED rule, it has too many loopholes and exemptions from the rule, making it too weak to address the problems of health, climate, and waste of God's resources. Please remove the exemption for stripper wells and the 15 tons per pollution threshold for volatile organic compounds. I am grateful for your work, but the rules need to be revisited so that

they can help us be good stewards of creation and protectors of health.

I ask that NMED, OCD, and NMEMNRD continue to revise and improve the rules and take us in a new direction toward a sustainable, renewable energy future for New Mexico.

As with so many other issues confronting our state (including produced water, abandoned uranium mines and radioactive waste storage), methane waste demonstrates that future decisions on projects affecting our health, environment, and climate need to include an analysis of the entire lifetime of the project, not just the short term economic benefits. It is so much more difficult and expensive to correct something than to identify and solve the problem at the beginning.

Sincerely,

Patricia Sheely

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(505) 722-7564
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