From:	Angelo Tomedi
To:	WasteRule, EMNRD, EMNRD
Subject:	[EXT] Feedback on the EMNRD draft rule
Date:	Sunday, August 9, 2020 7:44:46 AM

Tiffany Polak, NM EMNRD

Dear Ms. Polak,

My name is Dr. Angelo Tomedi. I am a Family Medicine physician. I live in Albuquerque and work in the UNM Southeast Heights clinic and for Presbyterian Hospital in Socorro. I am speaking on my own behalf and out of concern for the patients who suffer from the adverse effects of methane and air pollution from oil and gas development. I want to thank the New Mexico Energy, Minerals and Natural Resources Department for the opportunity to offer feedback regarding the EMNRD waste rule.

New Mexico has a methane waste and pollution problem that is polluting our air, harming our climate, and posing a serious health threat to all New Mexicans, as well as costing our schools millions of dollars in revenue. The pollution emitted from oil and gas production worsens asthma and affects lung development in children, and causes other serious health problems. A recent study has shown that pregnant women who live close to oil and gas wells have a higher risk of preterm birth, which is the leading cause of infant death.

Our state has some of the worst methane pollution in the nation. Important changes in the OCD waste rule are needed to protect New Mexicans, especially the Navajo and Latino communities, from the harmful effects of methane waste. The goal of capturing 98% gas capture seems appropriate, but OCD should set the goal on the basis of locality such as county or basin. Enforcement of gas capture requirements needs to be tightened. The rule should create automatic triggers for meaningful action rather than merely stating that the OCD may pursue a set of general actions against a company that is not compliant. OCD should require companies to contract with independent third-party verification to ensure accurate and reliable venting and flaring data. And finally, there are too many exemptions for venting in the draft rule.

Gov. Lujan Grisham has committed to adopting the oil and gas rules that are needed to cut methane and air pollution and safeguard the health of New Mexicans and the health of our planet. I would like to strongly urge the agencies to make the critical rule changes necessary to honor that commitment.

Thank you