From:	Ellen Raimer
To:	WasteRule, EMNRD, EMNRD
Subject:	[EXT] Gas Capture Requirement by locality
Date:	Saturday, September 5, 2020 4:38:20 PM

OIL Conservation Division of NM EMNRD:

The standard for gas capture needs to be set by locality either by county or basin. Otherwise the overall 98% capture goal will not be met.
OCD should require companies to contract with independent third-party verification to ensure accurate and reliable venting and flaring data.

Enforcement is critical.
Sincerely,
Ellen Raimer, MD