From:	Nick Knorr
To:	WasteRule, EMNRD, EMNRD
Subject:	[EXT] Comment on Natural Gas Waste Draft Rules
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The Oil and Gas Industry has long operated by transferring costs of production to the public in the form of air and water pollution which is damaging to public health and to the environment. It is time to end this freeloading.

The New Mexico Energy, Minerals and Natural Resources Department recently released draft rules targeting methane emissions and the pollution that leads to smog. These rules are intended to end the practice of the industry which has vented and flared gas without regard for the resulting harm to our communities. Indeed, the rules set the goal of capturing 98% of all gas.

The draft rules, while a welcome step, are undercut by loopholes, which would allow continued emissions, and provide insufficient regulatory supervision and enforcement. The rules should be strengthened by (a) requiring independent verification of venting and flaring data, (b) setting limits in each region as well as the state as a whole, (c) imposing meaningful sanctions for violations, (d) limiting venting and flaring to emergencies, and (e) creating an open and transparent process.

The final rules must remedy these shortcomings and protect the people and lands of New Mexico. With Trump's EPA gutting methane rules federally, our state is left exposed, unless our state government acts.

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