From:	Maria Chavez
To:	WasteRule, EMNRD, EMNRD
Subject:	[EXT] Draft emission and waste rules comments
Date:	Wednesday, September 16, 2020 2:12:29 PM
Attachments:	comments for draft rule.xlsx

Good afternoon,

Please refer to attachment below for all of the comments submitted through our methanemattersnm.org website.

Please let me know if you have any questions.

Thank you,

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Maria Chavez
Digital Design and Multimedia Manager
505-363-6828

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Maria Chavez
Digital Design and Multimedia Manager
505-363-6828

Name (First)	Name (Last)	Email	Add your personalized comment here
Saraswati	Khalsa	saraswati@khalsa.com	The proposed methane regulations fail to protect New Mexicans health, environment and safety because they exempt 95% of oil and gas wells from regulation. Unless the regulations are updated to ensure that 100% of wells are regulated, inspected and held to strict methane emissions standards than the entire rulemaking process was a farce designed to provide cover for the oil and gas industry. My children and grandchildren will suffer if the climate emergency is not addressed NOW. EMNRD and NMED must put people before profit.
Wendy	Tanner	wstpolitics@gmail.com	Our air is worsening, something I didn't expect to see in my lifetime.
Sarah	Potter	smpotterstudio@gmail.com	Please pass this important methane rule. It is critical for NM to take important actions to protect our citizens and address dangerous climate change.
Thomas	Carllon	tomcarllon@comcast.net	Air quality is very unsafe. We need better control of emissions. Thank you.
Denton	McCullough	dentonmccullough@hotmail.com	Thank you for the opportunity to provide public comment on these important rules.. I urge you to enact regulations that protect the health and well being of the residents living in the Permian Basin. Having been born in Roswell and grown up in Carlsbad and returned to retire here, I have seen a dramatic change for the worse in the quality of life here since the oil and gas boom began. Our physical and mental health are endangered with the toxic environment that we live in. It is your duty to protect the health and welfare of all the citizens of New Mexico . Strong methane waste rules must be developed and enforced for all wells to include leak detection and repair. Thank you, Denton McCullough 920 N. Richard St. Carlsbad, NM 88220
Peter	Callen	4winged@gmail.com	The scale of man-made methane leakage in NM is off the charts, what a disgrace to this state that we contribute so much greenhouse gas to the atmosphere. The real shame of methane leakage is that it is WASTE. We don't even get the benefit of heating or power production, just the pollution! This is horrible and it must stop now!
William	Britton	webritton@hotmail.com	The New Mexico Environment Department should not exempt the vast majority of wells from oversight including leak detection and repair requirements. This is unacceptable, and Sec. Jim Kenney should direct his agency to remove these loopholes. It is critical that exemptions for stripper wells and the 15 tons per year pollution threshold for volatile organic compounds be removed. These two exemptions combined would exempt 95% of all wells in the New Mexico. This is unacceptable. Pneumatic devices that help regulate fluids, pressure, and temperature are huge sources of emissions and can often fail to function properly. Leak detection and repair requirements should be extended to these devices. Colorado adopted these requirements with the support of the largest trade associations. NMED should consider requirements for "zero-bleed" or zero emission pneumatics regardless of whether a site has access to electricity. Oil and gas operators in Canada are already using solar to power these devices. NMED should consider monthly inspections for high producing well sites just as Colorado has adopted. While the Oil Conservation Division has developed a commonsense approach to the methane waste rule, critical changes are still needed such as limiting venting and flaring by county or region and requiring enforcement of gas capture plans. •OCD has set an appropriate goal that 98% of all gas be captured. However, if that requirement is not set by locality, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin. OCD should set the goal on the basis of locality such as county or basin. •OCD should create an open and transparent process for involving the public by adopting an annual reporting requirement on progress towards implementing the rule and providing more opportunities for the public to engage on OCD decision-making regionally such as on gas capture planning, well density and spacing. •The rule's current approach to enforcement is unacceptable. It says the OCD may pursue a set of general actions against any company that is not meeting the capture requirements. That's not good enough since prior administrations fail to enforce rules for decades. The rule must create automatic triggers for OCD to take meaningful action to motivate companies to comply. •OCD should deny drilling permits for applications without firm agreements for pipeline capacity, and sanctions like revoking a permit or forcing a well to shut in if a company doesn't follow through and down the road seeks permission to flare. •Given the well-documented history of widespread venting and flaring reporting non-compliance, 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. •The draft rule carves out too many exemptions for venting which is far more damaging to the climate than flaring. OCD should ban all venting except for emergencies and require gas to be put into pipelines. Flaring should only occur when absolutely necessary to protect health and safety. OCD should include provisions to ensure that flares combust nearly all of the gas and that flares stay lit. •OCD should be precluded for applying the 98% capture requirement to midstream pipeline and processing companies. But the rule still allows these companies to vent or flare methane during routine
Charles	Clements	CClements@live.com	The bottom line is not how much profit; it's how much damage. To make a profit from damaging people, wildlife and natural resources is not a "profitable" operation. The costs of the damage is not born by the billionaires making the profit, but by everyone else!
Charles	Clements	CClements@live.com	The bottom line is not how much profit; it's how much damage. To make a profit from damaging people, wildlife and natural resources is not a "profitable" operation. The costs of the damage is not born by the billionaires making the profit, but by everyone else!
David	Rogers	preacherdave.rogers@gmail.com	Greetings and thank you for allowing me the option to address these serious matters. The volatility of the market involving Oil and Gas, combined with the tremendous financial considerations the industry has for the citizens of the State of New Mexico have led many to believe that any efforts to regulate emissions is bad for News Mexico. The presumption of lost jobs, decreased State Funding, and budget cuts to our precious schools are heralded as justification for allowing the oil and gas industry to continue operating without adequate environmental controls. There is, however, a vastly different side to the controversial Oil and Gas story. As one who lives in Carlsbad, New Mexico and has to deal with the reality of the oil and gas industry every day--both the presumed blessings, and the very real curses--I believe it is necessary to have strict regulations on methane. Methane is a potent climate pollutant that is accelerating climate change and is released alongside toxic air pollution during oil and gas production that can worsen respiratory illness. Pollution emitted alongside methane, such as benzene, worsens asthma and affects lung development in children, and increases the risk of cancer, immune system damage, and neurological, reproductive, and developmental problems. Unfortunately, these scientifically proven facts have been undermined by partisan politics, the lure of vast financial wealth, and the legitimate needs of New Mexico to have adequate resources to fund schools and vital programs. This means that far too many people are crying for short-term financial gain without regard for the overall costs of such gain. In the end, the cost of not regulating methane release into our atmosphere will be far greater than any short-term financial gain. The destruction of our environment, degradation of human health, and acceleration of global climate change are realities humanity is already facing. I believe there is no more time to allow for gradualism. As a human community, we can no longer afford to destroy our home in the name of profit or ignore the fragile climate in the name of petty partisan politics. I am calling for reasonable, responsible, and enforceable regulations intended to eliminate the venting of toxic gas into the atmosphere.
Karen	Boehler	karen_boehler@yahoo.com	As an avid motorcyclist, I despise having to ride through areas in SE and NW New Mexico. Not only does it smell horrid — taking away from the enjoyment of my ride — but it has health risks. Ozone pollution, made worse by climate change, poses a serious threat to the health of all New Mexicans, but disproportionately impacts children, Native Americans and those living in poor, rural communities. In fact, more than half of all Native Americans in San Juan County – about 24,600 people – live within a mile of a wellsite. A strong, comprehensive methane rule is critical for climate and environmental justice for the Navajo Nation and for all New Mexicans. The five New Mexico counties home to 97 percent of the state's oil and gas wells – including San Juan aEddy and Lea Counties – are all at risk of violating federal ozone standards. During development, volatile organic compounds are released that form ozone or smog. That puts our children and the elderly (me) at higher risk for respiratory diseases such as emphysema and asthma. Methane also is a powerful climate change pollutant responsible for 25 percent of the warming we experience today, and oil and gas operations release ozone-forming pollutants that worsen respiratory diseases such as emphysema and asthma. If action isn't taken increasing oil and gas production will lead to even higher pollution levels.
susan	peirce	speirce@prodigy.net	Thank you for the opportunity to provide public comment on these important rules. The New Mexico Environment Department has failed to put forward a proposal that protects the health of New Mexico families and our climate. The NMED rule would exempt the vast majority of wells from oversight including leak detection and repair requirements. This is unacceptable, and Sec. Jim Kenney should direct his agency to remove these loopholes. NMED should consider monthly inspections for high producing well sites just as Colorado has adopted. Given the well-documented history of widespread venting and flaring reporting non-compliance, 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. It is critical that exemptions for stripper wells and the 15 tons per year pollution threshold for volatile organic compounds be removed. These two exemptions combined would exempt 95% of all wells in the New Mexico. This is unacceptable. Pneumatic devices that help regulate fluids, pressure, and temperature are huge sources of emissions and can often fail to function properly. NMED should consider requirements for "zero-bleed" or zero
Tom	Hawley	Timhawley58@gmail.com	Please help NM to be a safer state by applying these rules...for NM, this country, and planet.
Charlotte	Smith	abqnurse44@gmail.com	Methane is 86 times more powerful than CO2. NM wastes more methane than any other state - enough to meet the heating and cooling needs of every resident of the state. 93% of methane waste is avoidable. The proposed draft Methane Rule released by the NMED and EMNRD would require companies to capture 98% of their natural gas by 2026. Thank you for the opportunity to provide public comment on these important rules. The New Mexico Environment Department has failed to put forward a proposal that protects the health of New Mexico families and our climate. The NMED rule would exempt the vast majority of wells from oversight including leak detection and repair requirements. This is unacceptable, and Sec. Jim Kenney should direct his agency to remove these loopholes. While the Oil Conservation Division has developed a commonsense approach to the methane waste rule, critical changes are still needed such as limiting venting and flaring by county or region and requiring enforcement of gas capture plans. I would like to ask that the NMED air pollution rule includes the following: Pneumatic devices that help regulate fluids, pressure, and temperature are huge sources of emissions and can often fail to function properly. Leak detection and repair requirements should be extended to these devices. Colorado adopted these requirements with the support of the largest trade associations. NMED should consider monthly inspections for high producing well sites just as Colorado has adopted.
Joan	Robins	1robins@swcp.com	The proposed methane draft rules sound good and progressive, but the devil is in the details. 95% of the wells would be exempted from these new regulations and ways exist to go around the methane collection at times of blowouts and cleaning. We need to really lead in methane collection and control since we are the #1 producer of methane and it is injuring children and native peoples. Methane control is necessary throughout the state, not just the Permian Basin. Please make the effort to really reduce methane pollution with stricter guidelines in a timely manner.

CARRIE	Roach	croach57@gmail.com	Thank you for the opportunity to provide public comment on these important rules. The New Mexico Environment Department has failed to put forward a proposal that protects the health of New Mexico families and our climate. The NMED rule would exempt the vast majority of wells from oversight including leak detection and repair requirements. This is unacceptable, and Sec. Jim Kenney should direct his agency to remove these loopholes. While the Oil Conservation Division has developed a commonsense approach to the methane waste rule, critical changes are still needed such as limiting venting and flaring by county or region and requiring enforcement of gas capture plans. Gov. Lujan Grisham has committed to adopting nation-leading oil and gas rules to cut methane and air pollution. While we appreciate the hard work that the agencies have done to date. I urge the agencies to make the critical changes necessary to honor that commitment. Specific Policy asks (include some points that resonate with you) New Mexico Environment Department air pollution rule It is critical that exemptions for stripper wells and the 15 tons per year pollution threshold for volatile organic compounds be removed. These two exemptions combined would exempt 95% of all wells in the New Mexico. This is unacceptable. Also, these exemptions would disproportionately affect children as well as Navajo and Latino communities who are much more likely to live within a mile of a well in oil and gas-producing counties. Pneumatic devices that help regulate fluids, pressure, and temperature are huge sources of emissions and can often fail to function properly. Leak detection and repair requirements should be extended to these devices. Colorado adopted these requirements with the support of the largest trade associations. NMED should consider requirements for "zero-bleed" or zero emission pneumatics regardless of whether a site has access to electricity. Oil and gas operators in Canada are already using solar to power
Rose Marie	Cecchini, MM	rcecchinimm@centurylink.net	September 14, 2020 New Mexico Environment Department Oil Commission Division Santa Fe, NM 87505 RE:Public Comment on NMED Draft Ozone Precursor and Methane Rules Dear Members of NMED and OCM First of all, thank you for the vitally significant, arduous work you have accomplished in drafting the Ozone Precursor Emissions Rules, incorporating stakeholder collaboration, in response to Governor Lujan Grisham's Executive Order on Addressing Climate Change and Energy Waste Prevention. The Governor has committed to adopting nation-leading oil and gas rules to cut methane and air pollution. I appreciate the opportunity to participate in the process of formulating the finalized version of the Rule by offering public comment. The outcome of this important process will have lasting influence on the people, land, economy and environment of New Mexico for generations to come. I am Rose Marie Cecchini, MM, and have lived in Gallup, NM, for the past 24 years. I serve as Director of the Office of Life, Peace, Justice and Creation with Catholic Charities of Gallup Diocese. I offer these comments on behalf of concerned people of faith in communities of Shiprock, Farmington, Flora Vista, Bloomfield, Blanco, Aztec and other communities in San Juan county. In my visits to these communities, people have shared with me the adverse health and environmental impacts they experience and suffer from, caused by methane gas releases, venting, flaring, leaks, and associated toxic air pollution. Local residents describe how impacts from oil and natural gas facilities in their area are causing increase in asthma attacks, especially in children and
Avelina	Bardwell	avelina@newmexico.com	As a hospitalist physician I see the toll that air pollution and methane pollution takes on the health of the people of this state, especially the elderly and children. All wells in NM should be covered by air pollution rules, all should be inspected routinely, and all inspections and data should be transparent. thank you Avelina Bardwell MD
Sara	Keeney	skeeney@swcp.com	As we watch California burn and the Caribbean flood, I wonder what to tell my grandchildren about the impact of New Mexico methane on their climate future. PLEASE implement the most stringent rules on emissions. If there is some short term pain in terms of costs, it will be invaluable in helping to avoid much greater costs in the future.
nancy	galloway	ngalloway@aol.com	Gov. Lujan Grisham has committed to adopting nation-leading oil and gas rules to cut methane and air pollution. While the hard work that the agencies have done to date is appreciated, I urge the agencies to make the critical changes necessary to honor that commitment. The New Mexico Environment Department has failed to put forward a proposal that protects the health of New Mexico families and our climate. -OCD should create an open and transparent process for involving the public by adopting an annual reporting requirement on progress towards implementing the rule and providing more opportunities for the public to engage on OCD decision-making regionally such as on gas capture planning, well density and spacing. -It is critical that exemptions for stripper wells and the 15-tons-per-year pollution threshold for volatile organic compounds be removed. These two exemptions combined would exempt 95% of all wells in New Mexico. This is unacceptable. -Pneumatic devices that help regulate fluids, pressure, and temperature are huge sources of emissions and can often fail to function properly. Leak detection and repair requirements should be extended to these devices. Colorado adopted these requirements with the support of the largest trade associations. -NMED should consider requirements for "zero-bleed" or zero-emission pneumatics regardless of whether a site has access to electricity. Oil and gas operators in Canada are already using solar to power these devices. -OCD has set an appropriate goal that 98% of all gas be captured. However, but that requirement must be set by locality; otherwise, for companies with operations in both the San Juan and Permian Basins, all of the reductions could occur in the Permian. This would disproportionately affect Navajo and Latino communities in the San Juan Basin. OCD should set the goal on the basis of locality such as county or basin.
David	Robertson	robertson.david51@gmail.com	It is essential to have strong rules regarding methane in New Mexico. Climate change is killing us, and we need to take all steps we can to combat global warming. Thank you.
Ann	McCartney	asims98891@aol.com	Hello: Thank you for your efforts to address methane emissions and taking public comment. The draft rules do not go far enough. Please address these additional points: 1) It is critical that exemptions for stripper wells and the 15 tones per year pollution threshold for volatile organic compounds be removed. 2) Pneumatic devices that help regulate fluids, pressure, and temp are huge sources of emissions and can often fail to function properly. Lead detection and repair requirements should be extended to these devices.
Joseph	Yaroch	joseph.yaroch@gmail.com	It is important that the goal of a 98% reduction be applied to each basin, such that a higher degree of venting an flaring is not allowed in either of the major basins. It also is important that the OCD be required to take action when violations are found.
Marc	Reynolds	marc.reynolds196@gmail.com	I support the safe use of fossil fuels and a smart regulation of methane!
Dwight	Sims	dsims@sonic.net	I think it is critical to capture all the methane that we can as it is a precious and useful resource. Burning it or releasing it into the atmosphere is a tremendous waste and contributes greatly to global climate change. It may not always be profitable to capture methane, but it must be made part of the process of drilling for oil and gas(methane) which are not renewable resources.
Alberta	Lamson	nyc.sea.sf@gmail.com	For m, it is imperative to draft rules and stand behind any action to reduce methane emissions and other toxic emissions from oil and gas companies. I urge you to support draft rulings that require companies to capture 98% of their natural gas no later than 2026 Mrs Alberta W Lamson
Alberta	Lamson	nyc.sea.sf@gmail.com	For m, it is imperative to draft rules and stand behind any action to reduce methane emissions and other toxic emissions from oil and gas companies. I urge you to support draft rulings that require companies to capture 98% of their natural gas no later than 2026 Mrs Alberta W Lamson
Louanne	Johnson	ppjohnson18@gmail.com	I fully support the proposals drafted by the NMED and EMNRD to reduce methane and other emissions from oil and gas industries. We must protect our lands and air for the health and safety of Americans now and in the future. We can't afford to wait. We must take action now before it's too late
Ron	Faich	ronfaich@comcast.net	Since the draft rules have been released, it is clear there are significant exemptions that reduce the rules' effectiveness to protect public health and our climate. In some cases, waste of methane gas wouldn't be halted under the draft rules. These issues must be addressed. Reducing methane waste and pollution is critical for New Mexico right now as we're facing a confluence of crises in our economy, public health, and climate. New Mexicans lose more than $40 million each year in royalties that oil and gas operators are not required to pay for oil or gas produced on federal or state lands when they vent, flare, or leak methane rather than sell it. These are royalties that our schools and critical services like hospitals are in need of, especially now.
Susan	Sladek	susanasladek@gmail.com	The climate crisis is the most critical issue of our times. I support the draft rules released by the New Mexico Environment Department (NMED) and the Energy, Minerals and Natural Resources Department (EMNRD) to reduce methane and other emissions from the oil and gas industry. I agree that companies should capture 98% of their natural gas by 2026. I urge you to support the draft, too.
Susan	Peirce	speirce@prodigy.net	There are significant exemptions in the rule as it is now that reduce the it's effectiveness to protect public health and our climate. In some cases, waste of methane gas wouldn't be halted under the draft rules. These issues must be addressed. Reducing methane waste and pollution is critical for New Mexico right now as we're facing a confluence of crises in our economy, public health, and climate. New Mexicans lose more than $40 million each year in royalties that oil and gas operators are not required to pay for oil or gas produced on federal or state lands when they vent, flare, or leak methane rather than sell it. These are royalties that our schools and critical services like hospitals are in need of, especially now. The draft methane rules are a good first step – please make them the best rules they can be. Please jmake the rules stronger so that they meet our collective goals of protecting public health, maximizing
Michael	Lawler	oeillist@gmail.com	My comment is a question: if it's all about money, why are you incinerating it instead of using it's buying power to service your clientele? And specifically for my governmental representatives, why aren't you representing my best interests? Polluting OUR future makes no sense unless you are lazy or getting kickbacks from industry. It is time for business to be responsible and for elected and appointed representatives to serve and protect constituents. Power is vested in the People, then we hire facilitators to serve OUR interests. No more excuses, no more arrogance. You are not celebrities, you are OUR EMPLOYEES! Do your jobs!
Janet	Snowden	snowflower@cybermesa.com	Why waste precious resources when you can reduce methane emissions, save money and protect the health of the people and our beautiful planet!
John	Thayer	ranchorelaxonm@yahoo.com	We cannot afford to weaken the methane reduction rules. Anthropomorphic climate disruption is proceeding at a much faster pace than the most optimistic scientific predictions forecast. In addition, by allowing exemptions to the rules our state is being cheated out of the finances that are generated by the fossil fuel industry at a time when our state is under court order to improve our educational system, which relies on this funding. We need to transition away from our reliance on fossil fuel income and at the same time hold extractive industries accountable for contributing to climate disruption. Please set rules that will be the gold standard for the climate and our economy.

Randall	Phipps	mtnclan@msn.com	We must make these companies clean up their act. We will need to break away from our dependence on fossil fuels.
Carol	Sassaman	carol.sassaman@gmail.com	It's time to stop endangering the health of NM citizens, especially the Navajo who live near Chaco and are experiencing high rates of respiratory illness and whose lack of access to the internet limits their ability to participate in BLM hearings on fracking leases. If Colorado can do it so can we!
Cynthia	Edney	cedney@juno.com	Methane is a dangerous greenhouse gas. It needs to be controlled more carefully. Methane has been ignored for too long. There is evidence that climate change is effecting the quality of human lives already.
Tim	Duda	timduda@aol.com	No exemptions for methane rules! We have an obligation to protect the public and the environment from methane release. Corporate excuses and loopholes will NOT solve the methane issue. Regulations must be specific, enforceable and immediately put into effect. We will not be the victims of corporate abuse for their profits!
Brett	Falcon	desertwindmagic@gmail.com	It's time to reduce methane waste and pollution.
Ken	Bunkowski	kbunkowski@outlook.com	I strongly support the rules to reduce mathane and other emissions from the oil and gas industry. The technology to do so is available. The industry is being given time to do so. Finally, it is the right thing to do to protect the environment and the health of the citizens of New Mexico. DO THE RIGHT THING AS SO MANY OTHER INDUSTRIES ARE DOING!
Michael	Lawler	oeillist@gmail.com	For the life of me, I cannot understand why my government would allow the inconceivable waste of a virulent greenhouse gas that is also a valuable resource to be wasted while wasting my environment. What exactly is the purpose of government if not to pool OUR resources for the common good? It is why We The People elect officials to REPRESENT our best interests. We vote because we have a vote.
s	peirce	speirce@prodigy.net	The very first draft of the rules released by the New Mexico Environment Department (NMED) and the Energy, Minerals and Natural Resources Department (EMNRD) need modification to ensure New Mexico creates rules that result in real reduction of oil and gas pollution! Unfortunately, the New Mexico Environment Department has failed to put forward a proposal that protects the health of New Mexico families and our climate. The NMED rule would exempt 95% of wells from leak detection and repair requirements. This one loophole would disproportionately affect Navajo and Hispanic communities who predominantly live within a mile of a well in oil and gas-producing counties. This is unacceptable, and Secretary Jim Kenney should direct his agency to remove these loopholes. While the Oil Conservation Division has developed a commonsense approach to the methane waste rule, critical changes are still needed such as limiting venting and flaring by county or region and requiring enforcement of gas capture plans.