From: yucca@earthcarenm.org
To: WasteRule, EMNRD, EMNRD
Cc: artemisio925@gmail.com
Subject: [EXT] Youth United For Climate Crisis Action (YUCCA) Public Comment
Date: Wednesday, September 16, 2020 4:59:10 PM

YUCCA is emailing to comment on the draft methane waste rules put forward by the Oil Conservation division.

The OCD has set the goal of 98% of all gas being captured. However, this requirement is not set by locality, meaning all of the reductions could occur in the Permian. This would disproportionately impact Navajo and Latino communities in the San Juan Basin, reinforcing the environmental racism that New Mexico communities have experienced for generations. It is crucial that the gas capture goal be set for each county, not just statewide, to prevent this from happening.

Additionally, we believe that the OCD should reject drilling permits without firm commitments for pipeline capacity. If a company doesn't follow through and down the road seeks permission to flare, then there should be sanctions like revoking a permit or forcing a well to shut in. Thank you.

Sincerely,

Youth United for Climate Crisis Action.