

September 29, 2021

Chair Phoebe Suina and
New Mexico Environmental Improvement Board Members
% Pamela Jones, Hearing Administrator
1190 Saint Francis Drive, Suite S2102
Santa Fe, New Mexico 87505

Via email: pamela.jones@state.nm.us

Re: Strong Oil and Gas Rules Imperative for New Mexico's Outdoor Economy

Chair Suina and Board Members:

The undersigned support a strong state ozone rule that protects our state's environment and supports New Mexico's world-class outdoor recreation economy. As a whole, the outdoor industry employs up to 35,000 people in New Mexico and contributes more than \$2.4 billion in state gross domestic product. Simply put, the outdoor recreation industry is a major economic driver and employer in New Mexico that continues to grow at a time when we need new jobs most.

In order to continue to protect New Mexico's outdoor recreation industry, it is important to keep our air as well as our public lands and rivers healthy. But as droughts and fires become more intense and persistent in the West, we see lower water lines in our lakes and rivers and less access to our forest, parks and other public lands. Further, New Mexico is increasingly known as the nation's leading "methane hotspot," a reputation that threatens public health, our environment, and the economy.

Oil and gas operations in New Mexico emit hundreds of thousands of tons of smog-forming volatile organic compounds that can trigger asthma attacks and worsen other respiratory diseases such as emphysema. This is leading to New Mexico's top oil and gas producing counties to all get failing grades for poor air quality from the American Lung Association. It is also what is rightly prompting the New Mexico Environment Department to act through this rulemaking.

In addition to supporting the rules proposed by NMED in their July filing, we also request the EIB consider three key improvements to protect communities and address major sources of pollution:

- Protect those living closest to development by requiring more frequent inspections to find and fix leaks.
- Ensure strong requirements for operators to control pollution during the completion of an oil or gas well or when they redevelop an existing well.
- Strengthen requirements to cut pollution from pneumatic controllers that are used in oil and gas production. The devices are the second largest source of oil and gas methane

emissions in New Mexico. NMED should require companies to inspect pneumatics for leaks and accelerate the timeline to retrofit equipment with zero-bleed or zero-emission pneumatic controllers.

In addition to limiting air pollution, strong rules will also cut methane pollution as a co benefit. Methane is a powerful climate change pollutant responsible for 25 percent of the warming we experience today, and New Mexico is a primary source of our nation's methane pollution. In 2014, [NASA discovered](#) a methane cloud the size of Delaware over the Four Corners region, the highest concentration of methane in the United States. Five years later, the Permian Basin in southeast New Mexico revealed another huge concentration of methane. In fact, methane [escapes](#) from New Mexico facilities in the Permian Basin at a rate three times higher than the national average. And predictably we are experiencing longer, more intense wildfire seasons, a decreased snowpack, severe droughts, and life-threatening heat waves.

To protect our unique outdoor recreation landscapes, we need strong ozone rules that protects our environment while ensuring that future generations can continue to enjoy New Mexico's hiking, biking, hunting, fishing, climbing, skiing, and rafting. As EIB finalizes the state's rule, there is still time to make improvements such as increased protections for those living closest to oil and gas sites and by requiring more frequent inspections to find and fix leaks.

Healthy public lands and rivers are critical for New Mexico's outdoor recreation industry. Therefore, we urge NMED and the EIB to finalize a strong ozone rule that protects the health of New Mexicans while also supporting our thriving outdoor recreation economy.

Undersigned,

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