



September 27th, 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

Dear Chair Suina and fellow Board Members,

Ceres and ICCR, collectively with over 500 investors overseeing more than \$51 trillion in assets under management, commend Governor Lujan Grisham and the New Mexico Environment Department (NMED) for putting a strong proposal forward to the Environmental Improvement Board (EIB) to cut oil and gas pollution. The state's July proposal is a good one and we thank the department for addressing concerns raised by us and our members (see [investor letter from November 2020](#)) regarding the blanket exemptions that would have detracted from the effectiveness of the earlier draft. With a few key strengthening provisions, this proposal will help the state's oil and gas sector maintain its viability while protecting the health of New Mexicans and addressing the economy-wide risks of climate change.

We write today to support NMED's July proposal and to urge the EIB to include three key additions that are critical to meet the Governor's goal of enacting "[the country's toughest methane and air pollution rules](#)":

- **Frequent inspections to rapidly find and fix leaks in close proximity to homes and schools.** It is important that the final rule is strengthened to protect frontline communities by requiring more frequent inspections to find and fix leaks in close proximity to occupied dwellings – an approach that has been successfully implemented in the state of Colorado. Air pollution from oil and gas development poses a serious threat to the health of all New Mexicans but disproportionately impacts children, the elderly, Native Americans and those living in poor, rural communities. In fact, almost half of all Native Americans in San Juan County – about 22,000 people – live within a half-mile of a wellsite.
- **Capture or combust emissions during well completions.** The final rule also should be strengthened to ensure New Mexico incorporates leading approaches to address pollution created during well completions – an important measure to reduce methane emissions as well as protect local communities from harmful pollution. It should require operators to capture or combust emissions during completions including the initial flowback stage as the state of Colorado now requires.
- **Strengthen mitigation measures for pneumatic controllers.** Finally, the final rule should strengthen pollution cutting measures on pneumatic controllers, the



second-largest source of oil and gas methane pollution in New Mexico, by requiring operators to inspect gas-powered pneumatic controllers for malfunctions when operators conduct leak detection and repair inspections, as Colorado has done, and by accelerating the schedule for operators to retrofit their pneumatic controllers so they do not produce any methane emissions.

Our investor members recognize the significant financial risks posed by climate change as well as the enormous economic opportunities provided by low-carbon and climate-resilient technologies, markets and business models. Methane mitigation technologies have proven themselves cost-effective when implemented, driving additional revenue through the capture of an otherwise lost product.

Investors have made engagement with oil and gas companies on methane a key priority in recent years, working with companies to set targets and align their operational practices accordingly. We are encouraged to see that Occidental Petroleum – the largest acreage holder and one of the top producers in New Mexico’s Permian Basin – has aligned with public health and environmental advocates in support of even stronger state rules that will protect frontline communities from pollution.

New Mexico took an important step toward limiting waste and pollution from the oil and gas industry earlier this year when the Oil Conservation Commission adopted rules that eliminate routine venting and flaring of natural gas. The adoption of strong oil and gas air pollution rules by the EIB, with rigorous requirements to find and fix leaks, is a vital next step. We believe virtually eliminating methane emissions as part of a low-carbon transition can support the financial goals of both companies and investors. By taking robust action on methane emissions, New Mexico can achieve valuable greenhouse gas reductions while helping industry become cleaner and more competitive.

We appreciate Governor Lujan Grisham’s leadership and NMED and the EIB’s efforts to move forward these important regulations. The finalization of strong regulations will help protect the health of communities across New Mexico and better prepare the state and the industry for the future.

Sincerely,

Jennifer Helfrich
Senior Manager
State Policy
Ceres

Christina Herman
Program Director
Climate Change & Environmental Justice
Interfaith Center on Corporate Responsibility

Andrew Logan
Senior Director
Oil and Gas
Ceres

CC: Governor Michelle Lujan Grisham (via email: caroline.buerkle@state.nm.us)
NMED Secretary James Kenney (via email: james.kenney@state.nm.us)



Interfaith Power & Light New Mexico & El Paso Region

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September 25, 2021

Chair Phoebe Suina and
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Dear Chair Suina and New Mexico Environmental Improvement Board Members,

The UN Secretary-General António Guterres' called the recent UN Intergovernmental Panel Climate Change report a "code red for humanity". As faith leaders, we understand that code red means we all must take urgent action to care for life and our sacred Common Home. All of our religious traditions require caring for our neighbors as the ultimate commandment and act of Love. Every person, creature and element are neighbors.

In New Mexico, we have an opportunity in the regulatory process to say yes to life and the future. By approving strong ozone precursor rules that address methane pollution through the Environmental Improvement Board (EIB) hearing, we can join in community to make a positive and important difference. The work our state agencies do is so important to address the climate crisis facing New Mexico. Thank you for engaging the public in the EIB hearing process for new Methane rules. We are grateful for the Governor and our agencies who work toward climate justice, resiliency and the Common Good.

Methane pollution contributes to accelerated climate change and an uncertain future for New Mexico's children. Pope Francis, in the teaching encyclical Laudato Si: On Care of Our Common Home instructs us that the work for climate justice is not optional. We must work for clean air, water, land and community health as we address climate justice. Here in New Mexico this means addressing methane waste, which is a potent greenhouse gas 84 times more powerful than carbon dioxide in the near term. In fact, methane pollution contributes to about 25 percent of the global warming we are experiencing today. New Mexicans are already experiencing severe impacts of climate change – harming our health, air, land, water, and economy.

With a few key improvements, these rules can ensure that we really are protecting our frontline communities and address environmental and economic justice as we care for family, mother's and children's health and well-being. While the New Mexico Environment Department (NMED) has put

forward a strong proposal, three key additions are critical to meet Governor Lujan Grisham's goal of enacting "the country's toughest methane and air pollution rules." The final rules must protect those living closest to development by requiring more frequent inspections to find and fix leaks; require operators to control pollution during the completion of an oil or gas well or when they redevelop an existing well; and strengthen requirements to cut pollution from pneumatic controllers that are used in oil and gas production. We also believe that good rules make no difference unless the state puts resources for enforcement.

As faith leaders who minister in a variety of ways, we call for strong rules to care for the Common Good, our neighbors and all of creation, which we work to honor and care for. Climate change is happening now and we have a moral and ethical responsibility to act now in faithful ways.

In peace and good,

Sr. Joan Brown, osf, Executive Director, New Mexico Interfaith Power and Light
Sr. Rose Marie Cecchini, mm, Office of Life, Peace, Justice & Creation Catholic Charities Gallup, Gallup
Rev. Lynne Hinton, Conference Director NM Conference of Churches
Rt. Rev. Joel Garner, O.Praem. Abbot, Santa Maria de la Vid Abbey, Albuquerque
Rev. Dr. Barbara Doerrer-Peacock, Acting Conference Minister, Southwest Conference UCC
Rev. Joan Jiko Halifax, Abbot, Upaya Zen Center, Santa Fe
John A Kretzmann, Clerk, Santa Fe Monthly Meeting (Quaker), Santa Fe
The Rev. Holly Beaumont, D.Min. Organizing Director Interfaith Worker Justice –NM
Rev. Anne Morawski, ELCA Global Mission, Albuquerque
Fr. Tom Smith OFM Conv., Director Holy Cross Retreat Center, Mesilla Park
Rhonda Newby-Torres, Director of Luther House, Lutheran Campus Ministry New Mexico
Sr. Odile Coirier, fmm, Outreach Organizer NM IPL Southern NM and El Paso Region
Rev. Dr. Fred Schott, Evangelical Lutheran Church in America
Rev. Anita Amstutz, Mountain States Mennonite Conference, Albuquerque
Reverend Andrew Black, Founder of EarthKeepers 360 & First Presbyterian of Santa Fe
Henry Shukman, Guiding Teacher, Mountain Cloud Zen Center, Santa Fe
Sr. Marlene Perrotte, rsm, Immigration and Refugee Ministry, Albuquerque
Rabbi Neil Amswych, Temple Beth Shalom, Santa Fe
Sister Maria Isabel Galbe, RA Chaparral
Sr. Anne Saluan, RA Chaparral
Sr Maria Teresa Tellez, RA Chaparral
Rev. Ed Katzenberger, Presbyterian Minister, Albuquerque
Charlotte Smith, Member Baha'i community
Rev. Dr. Harry W. Eberts, Pastor, First Presbyterian Church of Santa Fe
Rev. Erica Lea-Simka, Pastor, Albuquerque Mennonite Church
Barbara Brandt, Buddhist Morning Light Sanga Gallup M.M., Jamestown, NM
Rev. Jean Siegfried Darling, Min. Emer., Peoples Church, Co-Chair Enviro. Justice Team, UU, Santa Fe
Rabbi Deborah J Brin, Rabbi Emerita, Congregation Nahalat Shalom, Albuquerque
Nick King, Mennonite Pastor, Carlsbad
The Rev. Carolyn W. Metzler, Episcopal priest and spiritual director, Datil
Dr. Kathleen O'Malley, Buddhist, Albuquerque
Rev. Dr. Robert B Woodruff, Pastor, Second Presbyterian Church, Albuquerque
Rev. Michael Sells, The Episcopal Church in Navajo land, Vicar San Juan Mission, Farmington

Deacon Andy Dimas, St. Anne Catholic Church, Santa Fe
 Edward Barlow, retired Methodist clergy, Ruidoso
 Tanya Barlow, NM conference UMW VP, Ruidoso
 Rev. Sue Joiner, Senior Minister, First Congregational United Church of Christ, Albuquerque
 Rev. Dr. Stephen J. Miller, Christian Church (Disciples of Christ) retired clergy
 Carla Lanting Shibuya, Lay Dominican, M. Div. Student, Shrine of the Little Flower, Albuquerque
 Sr. Catherine Clemons, heart still in Gallup
 Rev. H. Blaine Wimberly, United Methodist Pastor, Santa Fe
 Rev. Pamela Shepherd, Taos United Community Church, Taos
 Rev. Susan Allison-Hatch, Priest Affiliate, St. Michael and All Angels Episcopal Church
 Anna Rondon, Dine, Gallup
 Holy Cross Lutheran Church, Albuquerque
 Leland Bowen, Elder Las Placitas Presbyterian Church, Placitas
 Rev. Robert Aubrey retired CCDOC
 David Robertson, Member, First Unitarian, Cool Congregations Committee NM IPL, Albuquerque
 Samia Assed, Social Justice Leader, Islamic Center of New Mexico, Albuquerque
 Ken Jones, Environmental Stewardship Committee Chair, La Mesa Presbyterian Church, Albuquerque
 Elizabeth Diaz Ph.D retired LPCC, community organizer, La Mesa Presbyterian Church, Albuquerque
 Rev. Susan J. Quass, Presbyterian Church (USA), Albuquerque
 Rev. Vangie Chavez, Pastor Rising Sun Christian Community, Albuquerque
 Rev. Judith Wellington, Presbyterian Church (USA), Albuquerque
 Reverend Vincent Paul Chávez, Pastor, Saint Therese Catholic School and Parish, Albuquerque
 Rev. Roger Scott Powers, Pastor, St. Andrew Presbyterian Church, Albuquerque
 The Rev. Patricia Masterman, Deacon, Holy Family Episcopal Church, Santa Fe
 Fr. Charles McCarthy, ofm conv, Catholic communities of Laguna and Acoma
 Rev. Virginia Bairby, Pastor, First Presbyterian Church of Taos
 Rev. Dr. James E Roghair, retired member of Santa Fe Presbytery, Santa Fe
 Rev. Dr. Rich Holmes, Pastor, Las Placitas Presbyterian Church, Placitas-
 Rev. Madeline Hart-Andersen, Pastor, Westminster Presbyterian Church, Santa Fe
 Marlys Lesley, Environmental Stewardship Committee, La Mesa Presbyterian, Albuquerque
 Ruth Striegel, Green Justice team leader, First Congregational UCC Albuquerque
 Ella Joan Fenoglio, La Mesa Presbyterian Church, Albuquerque
 Janet Norden, Rev., CNP, United Methodist Elder, Chaplain, Albuquerque
 Jan Krakow, Deacon Retired, ELCA, Albuquerque
 Rev. Sarah Tevis Townes, Pastor and Teacher, Church of the Good Shepherd, Albuquerque
 Maureen "Molly" Murphy, Elder, Enviro. Stewardship Comm., La Mesa Presbyterian, Albuquerque
 The Rev. Angela Herrera, Senior Minister, First Unitarian Church, Albuquerque
 Fr. Vincent Petersen OFM Conv., Former pastor, Our Lady of Guadalupe Parish, Tortugas
 Rev. Larry Bernard, O.F.M., San Diego Missions: Jemez, Zia & Santa Ana Pueblos, San Ysidro, Ponderosa & Cañon
 Adam Horowitz, co-founder Nuns and Nones; Taproot, Albuquerque
 Linda Popelish, Morning Light Sanga, Gallup
 Rabbi Celia Surget, Congregation Albert, Albuquerque
 Sr. Marie Paule Willem, Pastoral Minister, St. Joseph Mission, Las Cruces
 Maria Luisa, lay Catholic Leader, Mesilla
 Rev. Tiffany Curtis, Pastor, The Open Circle: A Disciples of Christ Community, Santa Fe
 Don Handrick, Sr. Buddhist Teach, Foundation for Preservation of Mahayana Tradition (FPMT), Santa Fe

Rev. Alexander Lenzo, Pastor, St. Francis Episcopal Church, Rio Rancho
Rev. (retired) Elizabeth McMaster, Unitarian Universalist, Albuquerque
Rev. Dr. David Wasserman, Honorably Retired, Presbyterian Church, Presbytery of Santa Fe
Rabbi Paul Citrin, Albuquerque
Dr. Kathleen O'Malley, Buddhist, Albuquerque
Rev. Kenneth Cuthbertson, PCUSA, Retired, Albuquerque
Rev. Kristin Schultz, Pastor, All Saints Lutheran Church, Albuquerque

Texas Faith Leader supporters:

Father Edward Carpenter, Pastor, Catholic Parish St Luke El Paso, TX
Jean Ponder Soto, lay leader St. Luke, El Paso, TX
Keith Alan McNeil, lay faith leader, El Paso, TX



September 23, 2021

Chair Phoebe Suina and
New Mexico Environmental Improvement Board Members
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Dear Chair Suina and New Mexico Environmental Improvement Board Members,

As the New Mexico Environmental Improvement Board prepares to finalize regulations this month to reduce emissions from oil and gas operations, we urge the board to ensure these rules are the strongest and most effective they can be to protect our climate and the health of all New Mexicans. As local and tribal elected officials throughout New Mexico, it is our responsibility to help make our communities as safe as possible for our constituents. That includes advocating for a healthy airshed.

Oil and gas emissions pose health risks to children, the elderly and frontline communities in close proximity to oil and gas activity, which are often rural and tribal communities. Volatile organic compounds released through industry operations are one of the primary components of ozone pollution, which can cause and worsen respiratory problems, and is responsible for the poor grades New Mexico counties routinely receive for air pollution in the American Lung Association's annual State of the Air Report.

Unchecked emissions carry major economic implications for New Mexico as well, which depends on oil and gas royalties to fund schools, infrastructure, public health and safety and other services. Leaking, venting and flaring methane equates to \$43 million in tax and royalty revenue the state misses out on each year. Capturing this needless waste is money that comes back to our communities.

Methane is also a powerful greenhouse gas that has more than 80 times the warming potency of carbon dioxide over the first 20 years after it reaches the atmosphere, and is responsible for about 25% of the climate change impacts we're experiencing today. New Mexico is home to some of

the worst methane pollution in the nation. Reducing these emissions, therefore, is absolutely essential to addressing the climate crisis, and that requires stringent regulations that target methane and other pollutants that create ozone.

We are appreciative of the strong draft proposal that the New Mexico Environment Department released this spring, but urge the EIB to support rules with three key improvements: require more frequent inspections to find and fix leaks at well sites close to schools and residences; require companies to control pollution during well completions; and strengthen requirements to reduce pollution from pneumatic controllers, which are the second-largest source of methane emissions in New Mexico.

All of these improvements are necessary to meet Governor Lujan Grisham's state climate objectives and her commitment to implementing nation-leading methane and air pollution rules. They are necessary to protecting our most vulnerable communities and ensuring all New Mexicans can breathe clean air, preventing the needless waste of taxpayer-owned resources, and ensuring our state is healthy and thriving for generations to come.

We urge you to put New Mexico first and support these improvements.

Sincerely,

Carrie Hamblen
State Senator, District 38

Brenda McKenna
State Senator, District 9

Bill O'Neill
State Senator, District 13

Gerald Ortiz y Pino
State Senator, District 12

Mimi Stewart
State Senate President Pro Tem, District 17

Tara Lujan
State House Representative, District 48

Matthew McQueen
State House Representative, District 50

Kristina Ortez
State House Representative, District 42

Andrea Romero
State House Representative, District 46

Liz Thomson
State House Representative, District 24

Pat Davis
Albuquerque City Councilor

Tim Keller
Mayor, City of Albuquerque

Rosalyn Fry
Mayor Pro Tem, City of Aztec

Victor Snover
Mayor, City of Aztec

Adriann Barboa
Bernalillo County Commissioner

Alicia Edwards
Grant County Commissioner

Ken Miyagishima
Mayor, City of Las Cruces

Gabe Vasquez
Las Cruces City Councilor

Daniel Tso
Navajo National Council Delegate

GloJean Todacheene
San Juan County Commissioner

Anna Hansen
Santa Fe County Commissioner

Hank Hughes
Santa Fe County Commissioner

Carol Romero-Wirth
Santa Fe City Councilor

Alan Webber
Mayor, City of Santa Fe

AnJanette Brush
Taos County Commissioner

Nathaniel Evans
Mayor Pro Tem, Town of Taos