



July 29, 2026

New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Dr.
Suite N4050
Santa Fe, NM 87505

Re: Comments on New Mexico Environment Department Rule 20.2.51 NMAC, Methane Abatement

Dear Secretary Kenney:

GPA Midstream Association (GPA Midstream or Association) appreciates the opportunity to submit these comments on the New Mexico Environment Department's (NMED's) proposed 20.2.51 NMAC, Methane Abatement.

GPA Midstream has served the U.S. energy industry since 1921 and represents approximately 45 domestic corporate members that directly employ 57,000 employees engaged in the gathering, transporting, processing, treating, storage, and marketing of natural gas, natural gas liquids, crude oil and refined products, commonly referred to as "midstream activities." The work of our members indirectly creates or impacts an additional 470,000 jobs across the U.S. economy. In 2024, GPA Midstream members had an economic impact of \$191 billion through operating 502,900 miles of gas gathering pipelines, gathering more than 91 billion cubic feet per day of natural gas, and operating more than 342 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.

GPA Midstream supports the comments being developed by the New Mexico Oil and Gas Association (NMOGA) and appreciates NMOGA's leadership in coordinating practical, constructive industry feedback on this important rulemaking. GPA Midstream shares the goal of reducing methane emissions and supports effective, technically sound programs that improve environmental performance while remaining operationally feasible, legally durable, and consistent with existing state and federal requirements. In particular, GPA Midstream echoes these four core points raised by NMOGA:

1. The proposed super-emitter event threshold should be aligned with federal requirements.
 - The super-emitter event definition including emission events equal to or greater than 50 kg/hr is significantly lower than the definition of 100 kg/hr found in the federal methane rule, New Source Performance Standard (NSPS) subparts OOOOb and OOOOc.



2. Because methane is not subject to a National Ambient Air Quality Standard (NAAQS), NMED should clarify the legal basis for relying on NAAQS-related authority in this rulemaking.
3. The proposed recordkeeping and monitoring requirements appear substantially far more burdensome than comparable federal requirements and should be revised.
 - The requirement for owners and operators to investigate and repair within 3 days of receiving an event notification places an undue burden on members and are inconsistent with other existing regulatory requirements (i.e., 30-day period for leak detection and repair (LDAR) leak repairs)
4. Access to reliable electric power would solve many of the feasibility issues to meet the proposed process-controller requirements.
 - In many locations, requiring operators to rely on generators to run air compressors around the clock could increase overall emissions.

GPA Midstream respectfully urges the Department to continue working with NMOGA and other stakeholders before advancing a final rulemaking. Thank you for your consideration of these comments. We appreciate NMED's willingness to engage with stakeholders and would welcome the opportunity to continue discussing these issues as the rulemaking process moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Stuart Saulters". The signature is stylized with a large, sweeping initial 'S' and a long, horizontal line extending to the right.

Stuart Saulters
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