

20.2.50 NMAC Update

Minutes
06/02/2021

**TECHNICAL
EXPERTISE**

**Brought
Into FOCUS by
INDUSTRY
LEADERS**

All,

Thank you so much for everyone's participation and continued support regarding this rule. After the last meeting I received quite a bit of good technical feedback. As time allows, I will be sending out technical updates to our existing comments and requesting feedback from key individuals. The next officially scheduled meeting will be Wednesday June 30th at 1:00 pm central time.

EIB Meeting Recap – Friday 5/28/2021

Attached to this email you find youtube link to review the meeting in its entirety. The Friday meeting went over the following –

1. Timing of hearing & technical and rebuttal testimony
2. Appointment of Administrative Hearing Judge
3. Technical Information Availability
4. Covid Restrictions/ Public Notices

EIB Hearing Beginning 09/20/2021 (Two Weeks in Length)

1. 60 Day Notice
2. Non-Technical Testimony
3. Technical Testimony
4. Immediate vs. Hearing Officer Report
5. Pleadings Log <https://www.env.nm.gov/environmental-improvement/eib-21-27-petition-for-regulatory-change/>

Volunteers Needed

Recommendations & technical expertise in the following areas is requested –

Portable Analyzer Testing Statement & Data – An explanation as to why VOC testing cannot be performed is needed a long with an explanation of why ASTM 6522 specifically doesn't require it.

Examples of Common Equipment Manufactures Recommended Maintenance Issues

Feasibility research on zero bleed pneumatic pumps & controllers throughout the state of New Mexico

Explanation of how a monthly inspection of a catalyst is overly burdensome and not effective in mitigating emissions.

Any help relating to any technical area is always needed, so if something is not listed please let me know.

Advocacy & Political Efforts–

I would like to extend a big thanks to Eric Fierson and T.J. Tarabulski for initiating contact on behalf of the GCA with the New Mexico Oil and Gas Association and the Engine Manufacturers Association to try and collaborate on this issue. Hopefully by next Wednesday I'll have met with these organizations and or have an update on this.

I have also reached out the Gas Producers Association and will be following up with them before our next meeting.

If anyone has any other political or advocacy ideas, please send them my way. No idea or suggestion is too small. Also contacts at other organizations would be extremely helpful as well.

Non-Road Comment Efforts –

Michael Itsell with Cummins has provided a great deal of information related to Non-Road Engine regulation that will be incorporated into our existing comments. By the next meeting, a working draft of those comments will be sent out to the committee for review. I'd like to thank Michael for pulling that information together on such short notice, it was incredibly informative and helpful.

Technical Efforts -

The state has not provided any technical data to explain the updates to the draft rule. Without that information creating a cost metric to show why the new limitations will not work is exceedingly difficult. However, Caterpillar has generously offered expertise in this area so that it may be incorporated into the official comments.

Thanks again for everyone's continued support,

Dalyce M. Watson, M.A. ENV LAW
Environmental Specialist
Office: (903) 291.2742
Cell: (903) 331.8264
dhooper@jwenergy.com

122 Dovel Road
Longview, TX 75605

