



Attorney General Of New Mexico

HECTOR H. BALDERAS
Attorney General

September 9, 2015

ELIZABETH A. GLENN
Chief Deputy Attorney General

The Honorable Sally Jewell
Secretary of the United States Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Madam Secretary:

As Attorney General of New Mexico, I write to respectfully request that the Department of the Interior promptly complete the proposed Venting and Flaring: Waste Prevention and Use of Produced Oil and Gas for Beneficial Purposes Rule. The Venting and Flaring Rule will reduce waste of a public resource and provide economic benefits to the people of New Mexico to which they are entitled; will help address a defining issue of our time, climate change; and will provide health benefits to our families.

The Bureau of Land Management has a duty to minimize the loss of oil and gas resources on federal lands from which royalties to the federal government and states accrue. The Venting and Flaring Rule will reduce waste of these public resources. According to a recent study, our state has lost an estimated \$42.7 million in royalties from federal lands since 2009 because of leaks, venting, and flaring at oil and gas operations within New Mexico. In fact, there is more oil and gas waste in New Mexico federal lands than in any other state. New Mexico, therefore, is one of the states that will benefit most from the Venting and Flaring Rule. Royalties to which New Mexico is entitled can help our state's needs such as our struggling educational system, our underfunded mental health system, our aging roads and highways.

Methane is a potent greenhouse gas, 80-plus times more potent than carbon dioxide within the first two decades of emission. Curbing methane emissions is key to addressing climate change. As I am sure you are aware, New Mexico and the surrounding states in the Four Corners area, are home to a methane hot spot, with the highest methane emission levels in the nation. Scientists attribute leaking, venting, and flaring of methane from oil and gas operations in the region as a significant cause of the hot spot.

A co-benefit of curbing methane emissions is curbing other pollutants, such as benzene and volatile organic compounds, which are emitted with methane. Benzene is a known carcinogen

and volatile organic compounds can cause a range of human health issues, including increased risks of cancer, respiratory disease, and developmental disorders in children.

There are common-sense, cost-effective technologies available to reduce methane emissions from oil and gas operations. Some of these technologies will actually result in savings for the industry. There is a growing industry, producing new jobs, that has emerged to outfit well heads and drill rigs to reduce wasted gas. In New Mexico, we have at least 11 firms that manufacture, sell, or install these technologies.

As Attorney General of one of the states most affected by the Venting and Flaring Rule, I respectfully urge the Department of the Interior to move forward swiftly with a rule to help the people of New Mexico.

Thank you for your willingness to fight for good stewardship of our federal lands and public resources.

Sincerely,



Hector Balderas
New Mexico Attorney General

cc: Michael Connor, Deputy Secretary, U.S. Department of the Interior
Janice Schneider, Assistant Secretary for Land and Minerals, U.S. Department of the Interior
Neil Kornze, Director, Bureau of Land Management, U.S. Department of the Interior
John Blair, Director, Office of Intergovernmental and External Affairs, U.S. Department of the Interior
Shaun Donovan, Director, Office of Management and Budget