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EPA Region 8 Office

1595 Wynkoop Street

Denver, Colorado 80202

Public Hearing Testimony

EPA Methane Rollback Hearing

Docket Number: EPA-HQ-OAR-2017-0483, FRL-9984-38-OAR

My Name is Derrick Toledo.  I’m the Clean Energy Fellow for the Rio Grande Chapter of the Sierra Club and am speaking on behalf of our director Camilla Feibelman and our *Chair David Coss, former mayor of Santa Fe*; in addition to our over 10,000 members through New Mexico and West Texas.

 Oil and gas development is growing rapidly in New Mexico. In fact, in an article published on November 13, 2018 in the Texas Tribune, Kathleen Sgamma, the president of the lobbyist group Western Energy Alliance, called southeastern New Mexico “the hottest oil and gas area of the country.” She added that the Trump Administration’s regulatory rollback “[were] going to garner a lot of interest from industry.”

Oil production New Mexico, which had already been significant for decades, has more than doubled since 2009, with monthly output topping 500,000 barrels a day in the fourth quarter of 2017 for the first time ever. The share of New Mexico's production from shale gas wells has also greatly increased in recent years, with shale gas output more than **quadrupling** since 2010.

Partially due to oil and gas pollution, New Mexico’s air has long shown **high** concentrations of ozone—the primary ingredient of smog. The majority of New Mexicans currently live in counties where ozone levels exceed thresholds that are considered safe by EPA’s “Clean Air Scientific Advisory Committee,” and part of Doña Ana County has ozone levels that exceed EPA’s legally permissible limits.

Furthermore, hovering over New Mexico’s San Juan Basin is a 2,500-square-mile methane cloud. This “hotspot” is the largest area of elevated methane concentration ever measured in the U.S., and is so big scientists can spot it from space. Multiple studies have linked the formation of this enormous hotspot to air emissions from oil and gas development in New Mexico.

 Simply put, *oil and gas development in New Mexico is a major contributor to pollution in the state*, which must be reduced to safeguard the health and wellbeing of all New Mexicans, especially vulnerable populations such as the children, the elderly, low-income populations, and people with pre-existing lung or heart conditions. New Mexico is one of the poorest states in the country, and many of its residents are particularly susceptible to negative health outcomes resulting from air pollution.

This will be impossible under the Trump Administration’s current proposal to weaken the EPA methane rule. Under this rollback, oil and gas developers in New Mexico and across the country will be required to meet less stringent standards for finding and fixing leaking equipment at *new well sites and compressor stations*, which is the single largest source of air emissions from new oil and gas infrastructure

EPA is moving in the exact opposite direction of where it needs to be going to safeguard the health of New Mexicans. - Oil and gas fracking has exploded across the state in the last decade, and energy companies have indicated that they will pursue even greater levels of development in New Mexico if regulations are rolled back.

The EPA’s legal duty is to protect the health of our communities, not the profits of oil and gas companies. It is currently failing New Mexicans in carrying out that duty, in the proposed rollback of the methane rule will deliver yet another blow to our families and communities suffering from oil and gas pollution. The agency must abandoned this ill-advised and unlawful proposal and instead commit to forcefully combating oil and gas pollution.

Now I want to add a personal note to this topic. I am here today because my people need me be. In addition to my colleague, I’m probably the only Native American in the room today.

The extractive companies in my home state seem to care less about the repercussions of methane pollution because they live nowhere near the sacrifice area. - They don’t have a one year old daughter who has her whole life to live - next to these polluted areas. They don’t have a grandma who lost a ten year battle to cancer a couple months ago.

Why are these extractive companies still making the case for outdated forms of energy? I know it’s a ways away till we are fully transitioned to clean renewable energy but I feel that should still be at the front of this discussion. If we live like dinosaurs, we’ll be extinct like them.

Thanks for allowing me time to speak today.