

EIB 21-27

Day 7 Hearing Summary

In the Matter of Proposed New Regulation, 20.2.50 NMAC - Oil and Gas Sector – Ozone Precursor Pollutants

Tuesday, September 28 was Day 7 of the New Mexico Environmental Improvement Board (EIB) hearing on the New Mexico Environment Department's (NMED's) proposed ozone precursor rule.

Day 7 Highlights

Section 122/Pneumatic Controllers and Pumps. NMED witnesses presented testimony regarding the pneumatic controllers and pumps standards, and how the NMED changed the proposed standards based on comments from stakeholders. The centerpiece of the pneumatic controller standards, which are based on Colorado Reg. 7, is a schedule by which existing gas-driven controllers must be replaced with non-emitting controllers. The proposed rule also includes a requirement to conduct monitoring of gas-driven controllers to ensure they are operating properly. NMOGA and other industry parties testified in general support of the pneumatic controller replacement/retrofit program proposed, while seeking some changes.

Counsel for the GCA presented the testimony of GCA witnesses Mark Davis and Raymond Carr regarding the pneumatic controller requirements, acknowledged that the NMED had not changed the proposed rule to allow the continued use of intermittent controllers as requested by the GCA, and stated that the GCA was committed to working with its customers to comply with the final pneumatic controller requirements adopted by the EIB.

Section 120/Hydrocarbon Liquid Transfers. Testimony was completed on the proposed requirements relating to hydrocarbon liquid transfers.

Section 118/Glycol Dehydrators. A witness for the NMED presented testimony regarding the proposed glycol dehydrator standards and the bases for those standards. A witness for NMOGA presented testimony regarding certain changes that NMOGA seeks to the proposed standards.

Looking Ahead to Day 8

A National Park Service witness will testify on engine emission standards/Section 113.

Expected other topics: fugitive emissions monitoring/leak detection and repair (LDAR)

Once the National Park Service has completed its testimony and the GCA has had an opportunity to cross-examine the Park Service witness, the hearing will have made it through all the substantive areas of the rule on which the GCA has pursued changes and presented witness testimony.