

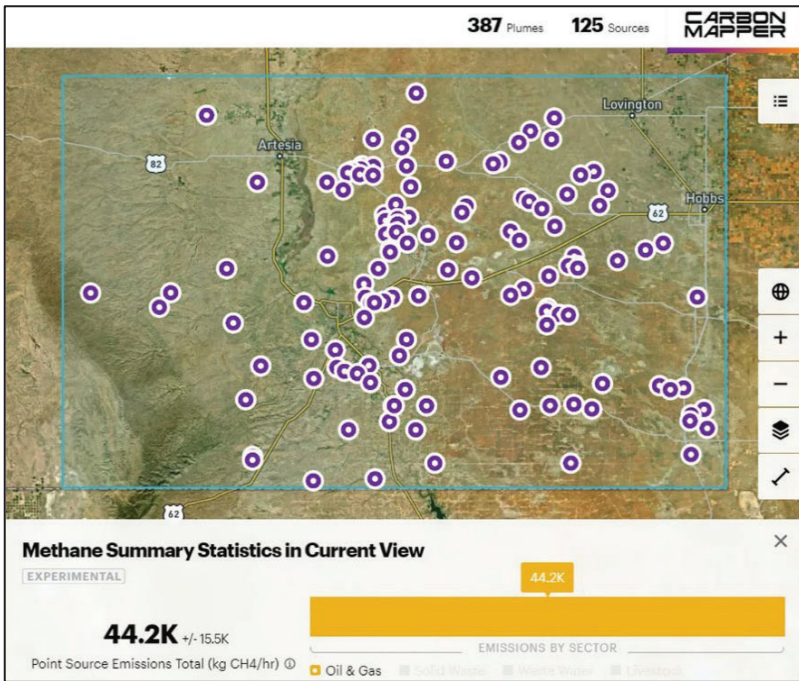


Oil and Gas Air Quality Regulation and Oversight

Legislative Finance Committee

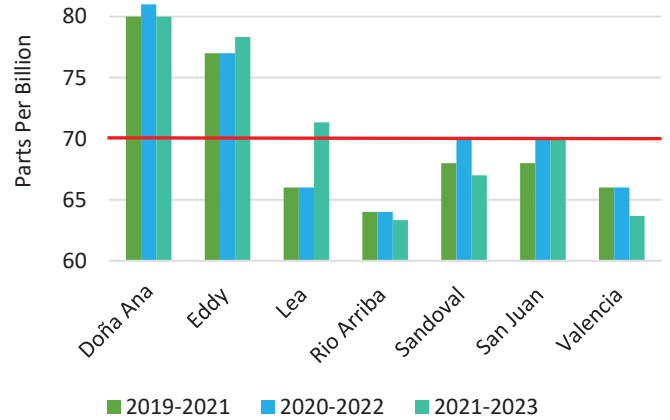
September 18, 2024

Super-Emitter Sources in the Permian Basin



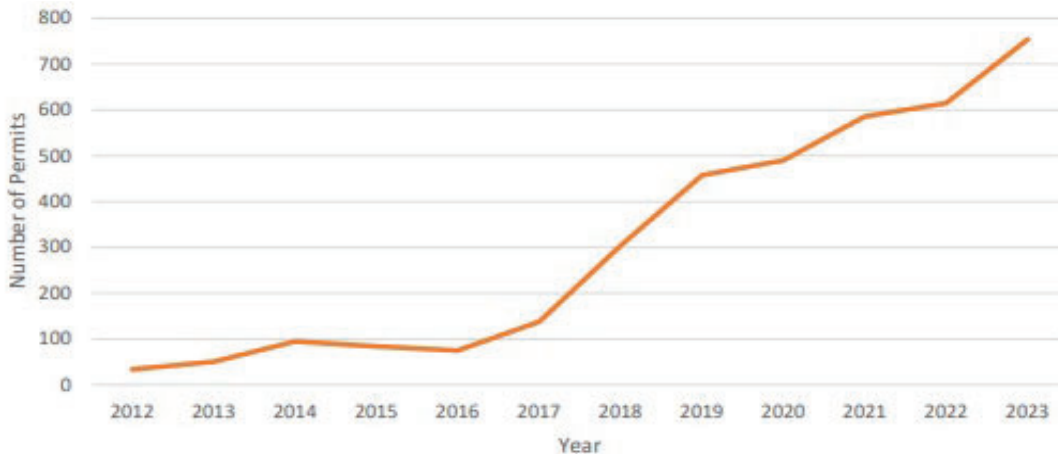
Total Point Sources: 44,200
 Plumes Detected: 387
 Emission Sources Detected: 125

Ozone Level Design Values, by county*



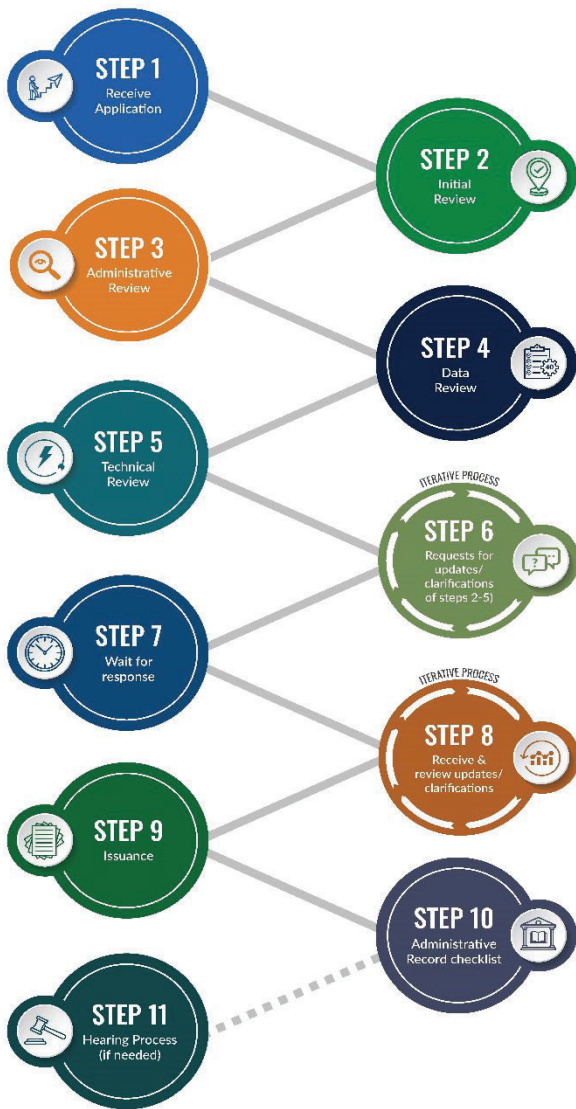
* Ozone levels in some counties are close to or exceed federal standards based on the EPA required three-year average, which is a statistic known as a "design value." NMED does not have jurisdiction in Bernalillo County and does not have monitors in all counties.

New or Revised Oil and Gas General Construction Permits Issued, by year





Permit Application Review Process



Steps & Estimated Time to Complete

1. Receive Application, 1-2 hours for staff to assign
2. Initial Review, 1 hour
3. Administrative Review, 2-4 hours
4. Data Review, 2-4 hours
5. Technical Review, 2-4 hours
6. Requests for updates/clarifications of steps 2-5
7. Wait for Response, 1-2 days
8. Receive & review updates/clarifications, 1-2 hours
9. Issuance, 1-4 hours
10. Administrative Record checklist, 0.5 hours



- Staff may review 15-20 permit applications at any given time.
- Total time to review an application varies by the quality of the application submittal, technical complexity, and responsiveness of the applicant.



* **Step 11: Hearing Process** can require hundreds of hours of staff work as described below:

a. Permit Specialist assigned to the permitting action in question.	<ul style="list-style-type: none"> • Assembles administrative record and administrative record index for hearing. • Drafts technical testimony. • Drafts rebuttal testimony. • Present technical testimony in the hearing. • Cross examination 	Depending on the level of opposition, between 120 and 160 hours
b. All other staff in the section take on the assignments that would otherwise be assigned to the permit specialist preparing for the hearing.	Increased permitting workloads	40-80 hours of extra work
c. Permit managers at all levels	<ul style="list-style-type: none"> • Secure a physical location for the hearing. • Draft the notice of hearing, arrange for alternative language translation, and send to the administrative team for publishing. • Acquire quotes for court reporter, alternative language interpretation, hearing officer, and any other service needed to offer fair participation in the hearing. • Review staff administrative record, administrative record index, and testimony. • Guide staff on appropriate public notice. 	50 hours
d. Administrative staff	<ul style="list-style-type: none"> • Send notice of hearing for publishing • Mail notices of hearing to citizens involved in the matter. 	2-5 hours depending on citizen involvement
e. Financial staff	Create purchase orders for all the services required for the hearing.	48-96 hours
f. Attorneys	<ul style="list-style-type: none"> • Review administrative record, administrative record index, and testimony. • Ensure all hearing deadlines are met. • Draft legal documents and serve them to all parties involved. • Execute testimony and cross examine other parties if necessary. • Pre-hearing and post hearing submittals 	6 hours for each day of a hearing
g. Bureau Chief	<ul style="list-style-type: none"> • Review staff testimony if controversial. • Approve PO's. 	5-10 hours