

Your name/organization]

[Address line 1]

[Address line 2]

October xx, 2023

Oil Conservation Commission  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Re: Chemical safety and rulemaking Case No. #23580

Dear Oil Conservation Commissioners:

I would like to express my support for WildEarth Guardians' rulemaking petition – Case No. #23580<sup>1</sup> – to end the use of Per- and Polyfluorinated Substances (PFAS) in oil and gas operations and update chemical disclosure requirements for the industry so the public can access critical toxicological data.

A recent report by Physicians for Social Responsibility confirms that the oil and gas industry uses PFAS in New Mexico.<sup>2</sup> Currently, the industry is permitted “trade secret” exemptions from rules governing chemical disclosure.

It is our duty to protect public health and safety. This includes ensuring equitable access to health and safety data. The public has a right to know what toxins are used or disposed of in our communities. Our health care workers and first responders need to know in order to properly protect themselves and others in the event of accidental exposures as well.

Whether toxins occur in oil and gas operations, solar panels or household products, all companies operating in New Mexico should be required to disclose the chemicals they use and what potential hazards exist. WildEarth Guardians' proposal to update rules pertaining to the oil and gas industry is one step in that direction and should be modeled for other sectors as well.

Without full chemical transparency, neither state nor local officials can uphold their duty to protect public health and safety.

Sincerely,

[Your name]

[Your organization]

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<sup>1</sup> Oil Conservation Commission Case No. #23580, available at <https://shorturl.at/eIntL>

<sup>2</sup> Physicians for Social Responsibility, “Fracking With ‘Forever Chemicals’ in New Mexico: Evidence Shows Oil and Gas Companies Have Used PFAS in New Mexico Wells; Water Risks Especially High for Groundwater-Dependent State,” available at <https://shorturl.at/IFK29>