

Comments for the Albuquerque Environmental Health Department (EHD) Air Quality Program (AQP) 2017 Annual Network Review

We are respectfully submitting comments for the record for your review and forwarding to EPA regarding the air quality monitoring stations because of inadequacies for the Albuquerque metro air shed. I am a Co-Director for Common Ground Community Trust, and NGO grassroots organization working to protect resident's property values and environmental concerns in the Sandoval and Bernalillo Counties' and the State of New Mexico. I worked as the director of Citizens for Environmental Safeguards for 15 years prior. Currently, I sit on the Source Water Protection Board For the City of Rio Rancho. I also teach art to children and adults.

It was in my art class last spring where I had 8 out of 10 children on asthma inhalers. I believe the already increased levels of particulate matter to the metro air shed has exacerbated respiratory health issues in the Albuquerque Metro that includes South East Sandoval County, the City of Rio Rancho and the Placitas area.

The transportation impacts from road tire latex emission impacts the existing air shed problems will be overlaid and integrated with the expansion of the oil and gas activity slated for Hydraulic Fracking of the Mancos Shale Formations from Sandoval and into Bernalillo Counties.

It is extremely important that we have baseline monitoring ahead of this expansion that may exceed the O3 allowances and impose penalties on the counties and municipalities. These air emissions issues will also impacts residents and the impoverished as they will bear the increased costs of emissions monitoring.

The City of Albuquerque must be made to expand the air monitoring to include the Northwest section of the ABQ City limits and Bernalillo county-line with Sandoval County, especially near the Espejo Compressor station. Over the past 4 years the gas company has quietly expanded holding tanks and replaced engines. And emitted over 176 tones of CO2 last year. It also has holding tank (s) of benzene.

“Natural gas development and production emits criteria pollutants as defined by the Clean Air Act (EPA, 2012). Nitrogen oxides (NO_x) and volatile organic compounds (VOCs) are associated with oil and gas development; in the presence of sunlight, these may react to form ozone and contribute to regional air problems. Regional chemical transport modeling has predicted that ozone may be of particular concern. Nitrogen dioxide and particulate matter (PM_{2.5}) emissions are also worrisome, but may be more of a local and regional issue as the Industry is allowed to expand.”ⁱ

The enforcement issue with the State of NM is virtually non-existent, when they do take yearly monitoring readings; it is not for the type of constituents of the potential oil and gas emissions from the Espejo Compressor station or extraction industries in the region.

The local air board does not monitor on the Westside of Albuquerque, which is a potential source exacerbating air quality in the region. There is an immediate need to protect the public welfare from the type of emissions possible from oil and gas infrastructure, exploration, development and production.

Hazardous air pollutants or air toxins are another category of pollutant that is emitted with shale gas development and production. Many operations necessary for oil and gas development use diesel-powered engines, which emit diesel particulate matter. Furthermore, natural gas fired engines can be significant sources of formaldehyde, which is also a secondary pollutant. Aromatics (e.g., benzene and toluene) and other VOCs can be released during shale gas production. Currently in the Checkerboard area of NW Sandoval County higher levels of Toluene have been collected for an ongoing health impact study.

Fugitive emissions released during shale gas extraction are also composed of greenhouse gases such as methane. Black carbon from diesel fuel combustion impacts climate and how the benefits of natural gas shift when emissions that directly impact climate change needs to be taken into consideration.”

The potential impacts on air quality for the region will be greatly exacerbated with already higher than normal points of O3 levels with the potential impacts from 15,000 to 30,000 oil and gas wells in the SE region of Sandoval county. The County is opening up 100,000 acres of private lands. The potential well development including Federal, Tribal and State lands including private property is estimated at 186,000 acres. Sandoval County is getting ready to approve a highly inadequate oil and gas ordinance that offers no air or water quality monitoring, health and safety protections and is abdicating its responsibility to the State of NM and the federal government who will not enforce the regulations.

“There are many sources of air pollutants along the shale gas development chain. *Hydraulic fracturing* is a single part of the shale gas development operation that occurs for a short period of time. Other activities associated with shale gas development are sources of air pollutants as well. Example of other important sources include

- *site preparation*, including building roads and clearing pads,
- *drilling* the well,
- *truck traffic* to deliver and remove materials and wastes to and from the site,
- *separation and treatment operations* (remove acid gases, remove water from natural gas and *separation* of natural gas from other hydrocarbons),
- *compressor stations* that pressurize natural gas in gathering and transport pipelines,
- *flaring* that burns off contaminated, noncommercial gas,
- *fugitive emissions* that escape unintentionally from cracks or leaks, and
- *blowdown and venting operations*.

The combination of all these activities creates air pollution, and the question that needs to be addressed is what the *net* effects are of these aggregate emissions from all of the activities associated with natural gas development and production on air quality.”ⁱⁱ

We are requesting air monitoring on existing infrastructure that has been quietly expanded and does not have the funding from the State to monitoring this area adequately. The monitoring equipment should be sited on the county border south of the Espejo Compressor station for Bernalillo monitoring purposes. This site should be setup with the prevailing winds. This site would gather data for baseline studies on Sandoval County increased migrating pollution and how that will impact the entire monitoring program for the City of Albuquerque and County of Bernalillo. This compressor station has been expended and holds a large storage tank of benzene that pose short and long term health exposures, safety concerns and to adjacent homes and schools from emissions and exposures.

The current testing and monitoring of the ESPEJO Compressor Station and facility are inadequate considering the potential threats to human health and air quality making monitoring station mandatory. We are requesting the siting of an air monitoring for this compressor station that are downwind, as well.

There are no other air monitoring areas in the Westside of Albuquerque and suggest that a sister monitoring station be set up on the Sandoval and Bernalillo County line in the North Albuquerque / Bernalillo County area, in the Northeast Height near Tramway,

The Air Board has gone on the record for stating the need for local ordinances because the feds and states for so lax in its mandated air quality standards for this polluting industry. However the ordinance draft for Sandoval County is woefully lacking any protections for air, water, health, and safety.

It is imperative that the air monitoring quality board considers expanding the monitoring system for this consideration because by no means is the current system adequate to handle existing impacts and to protect the air shed from the oil and gas expansion.

Respectfully,

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ⁱ **Roundtable on Environmental Health Sciences, Research, and Medicine;
Board on Population Health and Public Health Practice; Institute of Medicine.**

Health Impact Assessment of Shale Gas Extraction: Workshop Summary. Washington (DC):
National Academies Press (US); 2014 Dec 30.

ⁱⁱ IBID