

Public Comment for Upcoming Commission Meeting

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Comments:

Public comments have been sent to Each Commissioner individually Public Comments to the NMPRC Case No. 22-00309-UT: LNG Storage Facility are copied to the Sandoval County Commission for an upcoming Agenda Item on a resolution to Ban the LNG Facility .

"The NMGC's proposed LNG Facility, while claiming operational benefits, presents significant risks to our community. It's located near vital areas, such as an airport, schools, and neighborhoods, posing dangers to public safety and the environment. The facility's cost-effectiveness is questionable, potentially leading to higher expenses for consumers.

Moreover, the risk of explosions from LNG production and the motivation for NMGC's financial gain are concerning. Safety hazards from LNG tanker trucks and cumulative emissions exacerbating air quality problems are issues we cannot be ignored. This proposed facility could also diminish property values and create very few jobs. We've seen real-world disasters at LNG facilities worldwide, and it's crucial to prioritize clean alternatives rather than investing in new fossil fuel infrastructure.

We must consider the cumulative impacts of developments like these and the health risks posed by emissions, even if they are below regulatory limits. Monitoring is lacking in our region, and it's time to take these cumulative effects into account when making decisions about future developments."

oral comment

Please see the written comments attached

Thank you
Elaine Cimino

Written comments on LNG Plant facility

The purported operational advantages claimed by NMGC do not outweigh the substantial risks associated with its proposed LNG Facility. Situated within a ten-mile radius of Double Eagle Airport, 51 public schools, residential neighborhoods, and a housing shelter, this facility, fueled by fracked methane gas, poses grave threats to public safety and the environment. The facility's plan encompasses liquefaction, storage, and regasification components for injection into NMGC's existing distribution lines, as well as the transportation of LNG via trucks to other parts of the state, resulting in increased traffic and perils along already congested transportation routes. The health and safety concerns for Rio Rancho, Bernalillo County, and the neighboring communities are as follows:

Lack of Cost-Effectiveness: NMGC's LNG facility does not provide cost-effective solutions. It does not shield against potential price spikes and may, in fact, render us more susceptible to such spikes. The anticipated \$180 million cost to ratepayers for constructing the plant will not mitigate price volatility. Furthermore, the plant's capacity, which is less than half of the contracted capacity from the current supplier in Texas, might necessitate additional

purchases of gas on the volatile market, incurring high costs.

Higher Risk of Explosion: LNG production lines contain heavier hydrocarbons like ethane and propane, which pose a higher risk of explosion. Responding to LNG fires requires specialized training and equipment for emergency personnel (firefighters and hospitals). The unique safety challenges posed by LNG and related fires make them exceptionally difficult to control.

Financial Motivation for NMGC: The primary incentive for NMGC in building the plant seems to be the opportunity to add \$180 million with a guaranteed 9.375% return on equity to rates for the next thirty years. This would result in at least \$3 in additional costs per NMGC customer each month.

Safety Hazards from LNG Tanker Trucks: The proposed LNG tanker trucks could jeopardize the safety of New Mexico drivers and communities throughout the state.

Cumulative Emissions and Air Quality Issues: Impacts from boil-off gas and necessary intermittent venting could escalate cumulative emissions and worsen existing air quality problems in Rio Rancho and Albuquerque. Bernalillo County, according to a 2022 report from the American Lung Association, has a significant population prone to adverse health effects due to air pollution.

Property Devaluation and Limited Job Creation: The proposed facility may lead to a decrease in property values in nearby communities and will only generate 8 to 10 permanent jobs.

These dangers are not theoretical; previous incidents at LNG facilities worldwide have resulted in fatalities, fires, large-scale evacuations, and substantial property damage. Investing in new fossil fuel infrastructure will slow down the transition to cleaner alternatives and may eventually lead to stranded assets when decarbonization becomes imperative. This is not the time to invest in new infrastructure that obstructs the path to decarbonization.

Just four miles away from the proposed facility lies an already overburdened community in Rio Rancho. This community is already grappling with the consequences of the existing Espejo NG Compressor Station, which further compounds the emissions affecting this Environmental Justice community. The health ramifications stemming from the presence of formaldehyde and benzene, are as follows:

Short-term (acute) and long-term (chronic) inhalation exposure to formaldehyde in humans can lead to respiratory symptoms, as well as irritation of the eyes, nose, and throat. Some limited human studies have suggested a connection between formaldehyde exposure and the occurrence of lung and nasopharyngeal cancer.

Benzene, when in contact with the skin, eyes, or respiratory tract, can cause mild irritation. Acute exposure to benzene may result in central nervous system depression and the development of arrhythmias. Prolonged exposure to benzene may lead to conditions such as anemia, immune system alterations, and an increased risk of leukemia.

The Environmental Protection Agency (EPA) has estimated that having 10 parts per billion (ppb) of benzene in drinking water regularly consumed or exposure to 0.4 ppb of benzene in the air over a lifetime could elevate the risk of an additional case of cancer for every 100,000 individuals exposed. In simple terms, cumulative impacts involve the combined effects of various pollutants released by different sources within a community, including how these pollutants interact with each other and affect people who may already be socially vulnerable.

Even though the emissions fall below the Maximum Contaminant Level (MCL), the overall health risks from the cumulative impact are not being taken into account, primarily because there is a lack of monitoring in Sandoval and Bernalillo counties.

It is imperative to consider the cumulative impacts when deciding on the placement of any future developments in the area.

thank you for your time
Elaine Cimino

Oral Comments