



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

June 25, 2026

Marybeth Clifford
SLB

Via electronic mail

Electronic mail: marybeth.clifford@protect.llc

Re: Conditional Approval – SLB (formerly ChampionX) SOOFIE Alternative Monitoring Plan Second Alerting Threshold review for 20.2.50 NMAC

Dear Marybeth Clifford:

This letter serves as a conditional approval of the SLB SOOFIE application for its technology to be used by companies with facilities subject to the *Ozone Precursor Rule* as a pre-approved alternative monitoring technology pursuant to 20.2.50.116.D(2) New Mexico Administrative Code. To be eligible to use this technology in an Alternative Monitoring Plan, any company wishing to use this pre-approved technology at a specific facility must provide advance notice to the New Mexico Environment Department (Department or NMED) in accordance with 20.2.50.116.D(2)(a).

Facilities choosing to deploy the SLB SOOFIE Continuous Monitoring alternative monitoring plan must do so in a manner consistent with installation and operating practices included in the SLB SOOFIE Alternative Equipment Leak Monitoring plan provided to NMENV by Champion X on April 23, 2025, and the SLB SOOFIE method provided to NMENV on December 12, 2025, which includes, but is not limited to the following:

- The SLB SOOFIE alternative monitoring plan must be deployed according to the method described in the SLB Methane Alternative Test Method 13: SLB Periodic Screening System for Fugitive Methane Emission Monitoring document dated September 17, 2025.
- The alert threshold must be set according to the site PTE tier category (see tables below).
- Any AVO surveys required under the current Part 50 LDAR requirements must continue at the same frequency (monthly or weekly) when the SLB SOOFIE method is implemented.
- In addition to formal quarterly surveys and reports, the sensor system must be continuously monitoring year-round and site owners/operators must receive an active notification of any confirmed fugitive emission within 24-48 hours.
- When evaluating optimal sensor numbers and placement for any given site deployment, the configuration must achieve no less than a calculated probability of detection at the alerting threshold of 90% or greater over any survey period duration.
- Quantification of methane emissions must only occur when wind speeds are between 0.4 m/s (1.5 km/h) and 7.0 m/s (25.2 km/h) and the wind direction variability is less than 45° over any 15-minute-averaged period.
- Both calculated 15-minute-averaged and 1-hour-averaged results are appropriate outputs of this

method.

- SOOFIE systems must be placed within 100 meters of surveyed equipment or, if deployed at a height of 2 meters, within 1.5 times the height of the potential leak source.
- The SOOFIE system must perform a Digital Automated MOS Synchronization Algorithm check every 3 hours and recalibrate, if necessary and/or practical. This process must include the known bias-correction of the SOOFIE quantification results, if stable and consistent across all SOOFIE MOS.
- The SOOFIE MOS sensor must be replaced every 5 years.
- Any regulated equipment unable to be screened using the SOOFIE method must be surveyed using any other approved method in compliance with the Part 50 requirements.

Table 1. Approved Alerting Thresholds and Survey Frequencies According to LDAR-Sim Model Results - No AVO Surveys.

MDLs	Wells			Gathering & Boosting Processing Plants and Compressor Stations	
	Annual	Semi-annual	Quarterly	Quarterly	Monthly
5 kg/h	4x	4x	12x + OGI	12x + OGI	12x + OGI
10 kg/h	3x + OGI	3x + OGI	6x + OGI	6x + OGI	12x + OGI
15 kg/h	4x + OGI	6x + OGI	12x + OGI	12x + OGI	12x + OGI

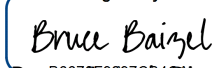
Note: AVO surveys conducted under Part 50 LDAR requirements must be continued. If AVO surveys are included with the Monthly LDAR survey frequency, the 15 kg/h alerting threshold is no longer applicable, and the 10 kg/h alerting threshold survey frequency must increase to every two weeks.

- The operator of a facility monitored by a SLB SOOFIE system must retain and make available for inspection upon request a copy of this approval letter, historical records up to 5 years prior, and any applicable training/certification documents for monitoring system technicians.

The New Mexico Environmental Protection Compliance and Enforcement Bureau thanks you for your interest in providing this service and for your patience as numerous technical questions were addressed during the application approval process.

Sincerely,

DocuSigned by:


 Bruce Baizel, Director
 Compliance and Enforcement Division
 New Mexico Environment Department