



MICHELLE LUJAN GRISHAM
GOVERNOR

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CABINET SECRETARY

March 18, 2026

Asa Carre-Burritt
Director of Policy and External Affairs
Bridger Photonics, Inc.
Electronic mail: asa.carreburritt@bridgerphotonics.com

Via electronic mail

Re: Conditional Approval – Bridger Photonics Alternative Monitoring Plan for 20.2.50 NMAC

Dear Asa Carre-Burritt:

This letter serves as a conditional approval of the Bridger Photonics, Inc. 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 Department in accordance with 20.2.50.116.D(2)(a).

Companies choosing to deploy the Bridger Photonics' Gas Mapping LiDAR™ (GML) technology must do so in a manner consistent with installation and operating practices included in the Alternative Equipment Leak Monitoring Plan provided to NMED by Bridger Photonics, Inc. May 16, 2025, which include, but are not limited to the following:

- The Bridger GML alternative monitoring plan must be deployed according to the method described in the Bridger Photonics, Inc. Gas Mapping LiDARTM (GML) Alternative Equipment Leak Monitoring Plan (AELMP) application document dated May 15, 2025.
- Bridger must attempt to notify site owner/operators of any emission events within 10 days of GML survey.
- The deployment invariant model gas concentration noise parameter must be continuously measured and the invariant model used to monitor field performance.
- Ground-level targeted OGI or EPA Method 21 inspections must be deployed to followup with any GML screening activity.
- GML site screening events may be substituted with facility-wide OGI inspections following the Appendix K protocol.
- Every GML must meet the three performance metrics of detection sensitivity, a quantification metric between 0.7 and 1.3, and a localization metric less than 2.0 meters prior to deployment.
- The GML must not be deployed if high ground wind speeds cannot be sufficiently offset through the selection of other deployment parameters.
- The GML must not be deployed to target areas with quantities of standing water as to prevent

sufficient returning laser light and is not applicable to target areas that comprise oceans, lakes, ponds, flooded regions, or rivers.

- If a GML scan indicates one or more emissions source(s), the source must either (a) be assumed as a persistent leak in need of a ground-level follow-up inspection; or (b) a secondary scan conducted to prove beyond a shadow of a doubt proper, intermittent behavior. Equipment that may emit by design must be checked to ensure proper condition and optimal operation.
- Repair timelines and protocols must follow regulatory requirements of 20.2.50 NMAC.
- Ground-level inspections must follow 40 CFR Part 60, Appendix K or Section 3(d) of the GML application.
- Recordkeeping must meet the regulatory requirements of 20.2.50 NMAC.
- The alternative monitoring plan is only applicable to the Part 50 regulatory tiers at the survey frequencies and probability of detection levels listed in the table below. All AVO surveys must be conducted at the regulatory frequency required under Part 50 (weekly or monthly).

Detection Sensitivity Threshold (90% POD)	Minimum Screening Frequency				
	Well Sites and Tank Batteries			Gathering and Boosting Stations and Natural Gas Processing Plants	
	<2 tpy VOC PTE (Annual, 1X)	≥2 <5 tpy VOC PTE (Semi-Annual, 2X)	>5 tpy VOC PTE (Quarterly, 4X)	<25 tpy VOC PTE (Quarterly, 4X)	≥25 tpy VOC PTE (Monthly, 12X)
≤1 kg/h	1X + AVO 2X + AVO	2X + AVO	4X + AVO 6X	4X + AVO 6X	8X 9X
≤2 kg/h	2X + AVO 3X	2X + AVO 4X	4X + AVO	4X + AVO	9X 12X
≤3 kg/h			4X + AVO	4X + AVO	
≤5 kg/h	4X	6X	12X	12X	12X
≤10 kg/h	3X + Annual OGI 5X	6X	8X + Annual OGI		
≤15 kg/h	4X + Annual OGI 6X	6X + Annual OGI 8X	12X + Annual OGI	12X + Annual OGI	

Note: POD levels with two or more frequencies listed indicate that more than one GML program passed the performance t-test and there are options to choose from at the given POD level.

- The operator of a facility monitored by a Bridger GML alternative monitoring 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,

Signed by:

A handwritten signature in black ink that reads "Bret Anderson". The signature is written in a cursive style. A purple rectangular box is drawn around the signature.

Bret Anderson, Chief
Environmental Protection Compliance and Enforcement Bureau
New Mexico Environment Department