New Mexico Alternative Fuel Pathway (AFP)

Application Guidance

INTERIM GUIDANCE

The New Mexico Environment Department (NMED) will accept New Mexico Alternative Fuel Pathway (AFP) applications beginning July 1, 2026, by email to ctfp.afp@env.nm.gov until the Alternative Fuel Module (AFM) is available.

Applicants that submit materials before the AFM becomes available may be required to resubmit the same materials through the CTFP-ARCS after launch. NMED intends to preserve the original email receipt date as the effective submission date, subject to confirmation in the Determination Letter.

DISCLAIMER

This guidance is informational only. It does not have the force or effect of law and does not impose requirements beyond 20.2.92 NMAC. In the event of any inconsistency between this guidance and 20.2.92 NMAC, 20.2.92 NMAC controls.

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Revision History Table

Revision #	Revision Date	Reason for Revision
0	1 July 2026	Initial release — interim guidance while AFM is under development

Acronyms

Acronym	Definition
AFM	Alternative Fuel Module
AFP	Alternative Fuel Pathway
AFPR	Annual Fuel Pathway Report
CTFP-ARCS	Clean Transportation Fuel Program Applications, Reporting, and Compliance System
CARB	California Air Resources Board
CBI	Confidential Business Information
CFP	Clean Fuels Program (Oregon)
CFS	Clean Fuel Standard (Washington State)
CI	Carbon Intensity, gCO2e/MJ
CTFP	Clean Transportation Fuel Program
FPC	Fuel Pathway Code
GREET	Greenhouse gases, Regulated Emissions, and Energy use in Technologies
ILUC	Indirect Land Use Change
LCFS	Low Carbon Fuel Standard (California)
NM-GREET	New Mexico-parameterized GREET lifecycle model
NMED	New Mexico Environment Department

1. Introduction and Purpose

New Mexico's Clean Transportation Fuel Program (CTFP), established under Section 74-1-18 NMSA 1978 and implemented through 20.2.92 NMAC[1], requires producers, importers, and dispensers of regulated transportation fuel to reduce the average carbon intensity of fuels supplied in New Mexico over time. The New Mexico Alternative Fuel Pathway (AFP) process allows a participant to obtain a certified carbon intensity value for a specific fuel, production facility, and feedstock combination, allowing accurate accounting of the average carbon intensity of transportation fuels used in New Mexico.

NMED will accept AFP applications beginning July 1, 2026. This guidance covers two New Mexico Alternative Fuel Pathway certification routes: (1) pathways novel to New Mexico (novel New Mexico Alternative Fuel Pathways) (20.2.92.205 NMAC), and (2) pathways certified in a similar program in another jurisdiction recertified for New Mexico use (other-state recertification pathways) (20.2.92.204 NMAC). Both routes are available at Tier 1 and Tier 2.

Until the Alternative Fuel Module (AFM) module launches, submit all applications by email to ctfp.afp@env.nm.gov. Pre-module submissions will be backdated to the effective date in the NMED Determination Letter.

[1] https://prod-rf-lambda.rtssaas.com/PublicFiles/d89c47bd0d70402dba89b03a22bda6d1/2009aa19-c548-4aa0-9ad4-71b7e7507f12/20.2.92.html

2. Who Needs a New Mexico Alternative Fuel Pathway?

Alternative fuel pathways are used to report transportation fuels other than those assigned a default (look-up table) pathway in Table 4 of 20.2.92.701 NMAC. The regulated party responsible for reporting the fuel — typically a fuel producer or importer — applies for a New Mexico Alternative Fuel Pathway. Regulated parties use approved pathways to report fuel that has been produced, imported, or dispensed for transportation use in New Mexico, regardless of whether they are the fuel's original producer.

Participant Type	AFP Required?	Notes
Fuel producer with NM-specific operations	Yes — Novel NM pathway (20.2.92.205)	Tier 1 or 2 per fuel type
Fuel producer with active CA/WA/OR certified pathway	Yes — Other-state recertification (20.2.92.204)	Other-state package accepted
Importer or distributor	Only if acting as pathway holder	May use pathway-holder FPC
Electric distribution utility (EDU)	No — NMED assigns CI annually	See 20.2.92.206 NMAC
Off-grid EV charging station operator	Yes — Tier 1 or Tier 2 AFP	See 20.2.92.206(C) NMAC

3. Two Pathway Certification Routes

3.1 Novel New Mexico Alternative Fuel Pathways (20.2.92.205 NMAC)

Applicants without an active AFP in California LCFS, Washington CFS, or Oregon CFP must apply for a New Mexico AFP under 20.2.92.205 NMAC. NMED determines the tier based on fuel type and production method (Section 4). Tier 1 uses simplified NM-GREET parameters; Tier 2 uses the full NM-GREET model and requires a full lifecycle analysis (LCA) report and process flow diagrams.

3.2 Other-State Recertification Pathways (20.2.92.204 NMAC)

A participant holding an active certified AFP in California LCFS, Washington CFS, or Oregon CFP may apply to NMED to certify that pathway for New Mexico. NMED uses the same model inputs as other states, adjusted for New Mexico parameters (e.g., transportation distance, ILUC values) from Table 9 of 20.2.92.701 NMAC, and differences between the other program's calculator and the NM Tier 1 or Tier 2 calculator (20.2.92.204(A) NMAC).

THIRD-PARTY VERIFICATION EXEMPTION: Other-state AFP applications that have undergone third-party verification in the other states and remain active under that program are exempt from NM verification under 20.2.92.508 NMAC, provided all prior verification reports are submitted to NMED with the NM application. (20.2.92.204(E) NMAC).

4. Fuel Tier Classification

NMED — not the applicant — determines the tier designation per 20.2.92.205(A) NMAC. Applicants declare a proposed tier in the application form; NMED may reclassify. For other-state recertification pathways, NMED will align the NM tier with the tier used in the other state's program.

4.1. Tier 1 Fuels (20.2.92.205(A)(1) NMAC)

- Starch- and sugar-based ethanol
- Biodiesel from tallow, animal wastes, plant oils, or used cooking oil
- Renewable diesel from tallow, animal wastes, plant oils, or used cooking oil
- Biomethane from landfills or anaerobic digestion of manure, wastewater sludge, food, vegetation, or other organic waste
- Electricity produced from a Tier 1 fuel above, a fuel in Table 4 of 20.2.92.701 NMAC, or a fuel with an existing NM AFP

4.2. Tier 2 Fuels (20.2.92.205(A)(2) NMAC)

- Cellulosic alcohol (ethanol from lignocellulosic biomass)
- Biomethane from feedstocks other than those listed under Tier 1
- Hydrogen (all production routes)
- Renewable hydrocarbons and renewable diesel from non-Tier-1 feedstocks
- Transportation fuel from biogenic feedstock co-processed at a petroleum refinery
- Alternative jet fuel (AJF) / sustainable aviation fuel (SAF)
- Synthetic fuel / e-fuel (power-to-liquid or similar)
- Renewable LPG
- A Tier 1 fuel produced using innovative methods or feedstock that cannot be accurately represented using the Tier 1 calculator
- Electricity produced from a Tier 2 fuel without an existing NM AFP

Fuels not listed in Tier 1 or Tier 2 and not covered by Table 4 or Table 5 of 20.2.92.701 NMAC may require a new temporary fuel pathway. Contact ctfp.afp@env.nm.gov before submitting documentation.

5. Application Process Overview

1. **Establish a temporary fuel pathway (if fuel is already being produced, imported, or dispensed in New Mexico):** If fuel produced at a facility is being used in New Mexico, ensure you have an approved temporary pathway or other-state CI value for interim reporting while your AFP application is under review (20.2.92.201(B) NMAC).

2. **Determine Your Route:** Check whether you hold an active CA LCFS, WA CFS, or OR CFP pathway. If yes, use the other-state recertification route (20.2.92.204). If no, use the novel New Mexico Alternative Fuel Pathway route (20.2.92.205).

3. **Determine Your Tier:** Review Section 4 to identify whether your fuel is Tier 1 or Tier 2. Contact ctfp.afp@env.nm.gov if classification is unclear.

4. **Complete the Application Form:** Complete the AFP Application Form (available on the CTFP website and from ctfp.afp@env.nm.gov) including all sections applicable to your pathway type.

5. **Assemble Supporting Documents:** Compile all required attachments per Section 6.

6. **Submit by Email:** Send the complete package to ctfp.afp@env.nm.gov with the subject line format in Appendix A. NMED will acknowledge receipt within 5 business days. For large Tier 2 files, request a large file upload link when submitting your application (see Section 9).

7. **Completeness Review:** NMED conducts an initial completeness review. Missing items trigger a written deficiency notice. The applicant has 30 calendar days to respond. This may occur up to 5 times before denial (20.2.92.202(D)(1) NMAC).

8. **Technical Review and Approval:** Once complete, NMED conducts technical review and issues a Determination Letter approving, approving with conditions, or denying the pathway (20.2.92.202(D)(2)-(4) NMAC).

9. **Fuel Pathway Code Issued:** Upon approval, NMED issues a Fuel Pathway Code and activates it in CTFP-ARCS. Format: NM-[fuel code] (novel) or NM-[P]-[fuel code]-[state] (other-state). Pre-module submissions are backdated to the effective date in the Determination Letter.

6. Required Documents

The following matrix identifies required attachments for each application route and tier combination.

Required Document	Novel NM Tier 1	Novel NM Tier 2	Other-State Tier 1	Other-State Tier 2
Cover letter on organization letterhead	Y	Y	Y	Y
Completed AFP Application Form	Y	Y	Y	Y
Facility information summary and site map	Y	Y	Y	Y
Tier 1 CI calculator (unlocked)	Y	—	Y	—
Tier 2/NM-GREET1.0 full model (unlocked)	—	Y	—	Y
PDF printout or calculator model summary	—	Y	—	Y
List of modified / changed cells (Section 4 of form)	Y	Y	Y	Y
Engineering report substantiating model modifications	—	Y	—	Cond.
Operational data records supporting proposed CI	Y	Y	—	—
General Attestation Letter — Responsible Official	—	Y	—	Y
Fuel-specific attestation (biomethane/biogas)	Cond.	Cond.	Cond.	Cond.
Third-party verification plan or statement	—	Cond.	—	—
Other-state pathway application package + staff summary	—	—	Y	Y
Other-state verification reports (all)	—	—	Y	Y
Confidentiality index / file list (if claiming CBI)	Cond.	Cond.	Cond.	Cond.

Y = Required | Cond. = Conditionally required | — = Not required

7. Modified Cells List and Engineering Report

7.1 Modified Cells List

Tier 1 and Tier 2 applicants must list all modified or changed cells in the Tier 2/NM-GREET1.0 model or Tier 1 CI calculator (Section 4 of the application form). For each modified cell, provide:

- Cell reference (row and column identifier or cell address)
- Cell name or description as labeled in the model

- Default value from the unmodified Tier 2/NM-GREET1.0 model or Table 4 of 20.2.92.701 NMAC
- Modified value and unit of measure

7.2 Engineering Report

The engineering report substantiates the model modifications in the Section 4 table. The report must: state the purpose and scope of modifications; describe the engineering basis and data sources for each modified cell; explain how site-specific data was collected; identify third-party data with citations; and confirm that modified values represent actual operations or design specifications.

RECERTIFICATION NOTE: If your other-state record includes an equivalent engineering report, you may reference that document and describe NM transportation adjustments instead of a new report — subject to NMED approval.

8. Recertification from Another State (20.2.92.204 NMAC)

If your fuel pathway has been certified under CA LCFS, WA CFS, or OR CFP, you may apply for an other-state recertification pathway under CTFP. A recertification allows NMED to review the other-state submission record rather than requiring a full NM AFP application. You must still demonstrate that the proposed CI reflects transportation and other adjustments for fuel supplied to New Mexico.

For another state recertification application, provide:

- The other state agency, program name, and Fuel Pathway Code (FPC) or equivalent identifier.
- A copy of the other state fuel pathway application package, including the approved calculator.
- An updated New Mexico calculator reflecting transportation distance and mode adjustments to New Mexico.
- Summary letter describing what changed relative to the other state pathway.
- The other state certified CI value and any subsequently updated CI values.

NMED will accept other state packages prepared under CARB LCFS, Washington CFS, or Oregon CFP as the basis for CTFP recertification review. NMED reserves the right to request additional documentation to assess whether the other state pathway adequately represents fuel supplied to New Mexico. (20.2.92.204(B) NMAC)

9. Large-File Submissions (Tier 2)

Tier 2 applications may include large Excel-based CI calculator files, extensive operational records, or engineering reports that exceed standard email attachment limits. NMED uses KiteWorks secure file transfer for these submissions. Before sending a large-file package, send a

request email to ctfp.afp@env.nm.gov using the subject line format in Appendix A. NMED will respond with a secure upload link. Do not send large files as regular email attachments.

> Files submitted via KiteWorks must be clearly labeled to match the application form (org name, pathway number).

10. After You Submit

Acknowledgment (within 5 business days): NMED will send a confirmation email acknowledging receipt of your application.

Completeness Review: NMED conducts an initial completeness review. Missing items trigger a written deficiency notice; the applicant has 30 calendar days to respond unless NMED grants an extension.

Technical Review: Once complete, the application enters technical review. NMED may request additional data or model revisions.

Determination Letter: NMED issues a written Determination Letter approving, approving with conditions, or denying the application.

FPC Activation: NMED assigns a Fuel Pathway Code and activates it in CTFP-ARCS. Pre-Alternative Fuel Module (AFP) submissions will be backdated to the effective date in the Determination Letter.

> A pathway is NOT certified until NMED issues a written Determination Letter and assigns a Fuel Pathway Code. Do not report fuel using an FPC until NMED notifies you in writing that the FPC is active.

11. Annual Fuel Pathway Report

Applicants with active Tier 1 or Tier 2 pathways must submit an Annual Fuel Pathway Report (AFPR) by March 31 of each year for the prior calendar year (20.2.92.301(A) NMAC). Send to ctfp.afp@env.nm.gov using the subject line format in Appendix A, or upload via AFM once available.

The AFPR must include:

- A summary of changes to feedstock, production process, equipment, or transportation since the prior reporting period.
- Updated operational data for any cells that changed from previously certified values.
- An updated modified-cells list if changes occurred (same format as Section 4 of the Application Form).
- A signed certification confirming that reported CI values remain accurate.

> NMED may require a revised pathway application if changes materially affect the certified CI. Annual Fuel Pathway Report templates will be published on the CTFP website when available.

12. Pathway Codes and Terminology

When NMED approves a fuel pathway, it issues a Fuel Pathway Code (FPC) — a unique identifier used in CTFP-ARCS to track credits and deficits. The FPC format is NM-[fuel type code]-[pathway number] for novel pathways and NM-P-[fuel pathway code]-[state] for other-state pathways. Pathway holders must reference the FPC on all quarterly fuel reports submitted in CTFP-ARCS.

13. Contacts and Resources

Contact / Resource	Details
NM AFP Application Submission	ctfp.afp@env.nm.gov
CTFP-ARCS/Quarterly Reporting (FRS, CBTS)	CTFP.ARCS@env.nm.gov
General CTFP Program	cleanfuel.standard@env.nm.gov
CTFP website	https://www.env.nm.gov/clean-transportation-fuel-program/
CTFP Contact Page (listserv sign-up, 1-on-1 help sessions)	https://www.env.nm.gov/clean-transportation-fuel-program/contact-us/