September 8, 2026

Jordan Garner
Insight M Inc.
Electronic mail: jordan.garner@zeitview.com

Via electronic mail

Re: Conditional Approval – Insight M, Inc. LeakSurveyor™ Alternative Monitoring Plan for 20.2.50 NMAC

Dear V Prentice:

This letter serves as a conditional approval of the Insight M, Inc. LeakSurveyor™ 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).

Companies choosing to deploy the Insight M, Inc. LeakSurveyor™ alternative monitoring plan must do so in a manner consistent with practices included in the Insight M, Inc. LeakSurveyor™ Alternative Equipment Leak Monitoring plan provided to NMED by Insight M on July 18, 2025, which includes, but is not limited to the following:

- The Insight M LeakSurveyor™ alternative monitoring plan must be deployed according to the method described in the Insight M, Inc. LeakSurveyor™ Alternative Equipment Leak Monitoring Plan (AELMP) application document dated July 18, 2025.

- Insight M must attempt to notify site owner/operators of any emission events within an average of 2 days from the leak survey, with all data delivered to the asset manager no later than 5 days after the leak survey occurred.

- Site weather conditions must be monitored prior to deployment and throughout the duration on the day of deployment to ensure data collection occurs within the instrument's operating envelope and to allow for real-time flight rerouting, if necessary.

- Ground-level targeted OGI or EPA Method 21 inspections must be deployed to follow-up with any LeakSurveyor™ screening activity to accurately pinpoint the leak source.

- LeakSurveyor™ inspections must have a calculated optimal target altitude above mean sea level based on anticipated weather conditions and digital elevation model terrain analysis prior to flight deployment.

- If multiple operator assets in a target survey area require different regulatory survey frequencies, then the highest survey frequency required by any sites in the area must be utilized or the asset can be surveyed as a

separate target survey area to ensure appropriate survey frequency.

- All calibration requirements, maintenance procedures, and training plans must be followed as presented in the Insight M application package dated July 18, 2025.

- All DQIs and QA/QC procedures must be followed as described in the Insight M application package dated July 18, 2025.

- All LeakSurveyor™ operating envelope conditions must be monitored and maintained throughout the duration of the survey, with any data collected outside of these conditions flagged or removed and/or the site marked for re-survey.

- All AVO surveys must be conducted at the regulatory frequency required under Part 50 (weekly or monthly).

- The operator of a facility monitored by the LeakSurveyor™ 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 Air Quality 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,

Kerra Roudebush Digitally signed by Kerra Roudebush
Date: 2026.09.08 12:56:46 -06'00'

Kerra Roudebush, Bureau Chief
Environmental Protection Compliance and Enforcement Bureau
New Mexico Environment Department