



Natural Gas Vehicles for America

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Governor Michelle Lujan Grisham  
490 Old Santa Fe Trail Room 400  
Santa Fe, New Mexico 87501  
(governor.state.nm.us)

CC: Secretary James C. Kenney  
New Mexico Environment Department

Dear Governor Lujan Grisham:

Natural Gas Vehicles for America (NGV America), the national trade association for the natural gas vehicle industry, respectfully submits this letter to signify our support for New Mexico 2024 House Bill 41 that calls for a Clean Fuels Standard (CFS) program to be implemented in New Mexico to enable additional revenue streams for New Mexico and clean jobs for New Mexicans, while reducing the life cycle carbon intensity of transportation fuels.

NGV America endorses strategies that support the use of zero emission vehicles (ZEV), near-zero emission vehicles and a transition to low-carbon transportation fuels such as conventional natural gas and renewable natural gas (RNG or biomethane), and hydrogen. There is **no one solution** to the pressing environmental issues facing the transportation sector. Policy makers should move quickly to deploy those technologies and solutions that are readily available, maximize cost-effective emission reductions, and provide a real pathway to carbon neutral or carbon-negative emissions.

The urgency of emissions reductions is the reason HB 41 enables rulemaking to create a Clean Fuels Standard program. A CFS promotes emissions reductions across the full life cycle of a fuel and is not just a tailpipe emissions reduction plan as most ZEV programs are. The Argonne National Laboratory's GREET Model provides an impartial assessment of fuels and is the national standard tool used to calculate various fuel's emissions reduction potential and is described below.

A Clean Fuels Standard will reduce New Mexico's carbon emissions by incentivizing the increased use of transportation fuels with lower carbon intensities. A CFS promotes the blending of traditional fuels with renewable fuels to reduce emissions and provides credits for producers of low carbon intensity fuels that can be purchased to off-set the impact of high carbon intensity fuels. Also, a CFS is technology neutral, allowing market forces to produce the best path to cleaner transportation in New Mexico.

A CFS promotes the production and usage of the cleanest fuels. Renewable natural gas, or RNG, made from animal waste has the lowest carbon intensity of any fuels including electricity and hydrogen. New Mexico has an abundance of crop, dairy and other animal farms, some of which are already producing RNG and other bio and renewable fuels, providing economic opportunity for many rural areas of New Mexico.

Advocating the increasing use of NGVs where they benefit most.  
For the economy. For the environment. For health. For security. **For America.**

California has a highly successful Clean Fuels Standard Program, as does Oregon and now Washington. Many states are considering a similar program including Illinois, Massachusetts and Michigan, who have active bills as does New Mexico. NGVAmerica commends New Mexico for its leadership in continuing to advocate for a Clean Fuels Standard.

New Mexico has a history of supporting alternative fuel vehicles as the best path to building greater demand for New Mexico-produced clean fuel products, cleaning the environment by using lower emission vehicles in transportation, and providing economic benefit to the state and its constituents. Implementing a CFS in New Mexico will continue to enable the cleanest and best for purpose fuels to be used for transportation in New Mexico.

Thank you for your consideration and please contact me, or Sherrie Merrow at [smorrow@ngvamerica.org](mailto:smorrow@ngvamerica.org) or 303.883.5121 with any comments or questions.

Sincerely,



Daniel J. Gage  
President