



November 24, 2025

New Mexico Environmental Improvement Board
New Mexico Environment Department
1190 South St Francis Drive
Santa Fe NM 87505

RE: Proposed Adoption OF 20.2.92 NMAC Clean Transportation Fuel Program

Chair Suina,

Introduction

The American Biogas Council (ABC) is the national voice of the United States biogas industry and represents more than four hundred companies across the full biogas supply chain. Our members include project developers, technology providers, municipalities, utilities, farmers, and companies that recycle organic material into renewable energy and soil products. Together, we work to maximize carbon reduction and economic growth through anaerobic digestion and biogas systems. We appreciate the opportunity to comment on New Mexico's proposed Clean Transportation Fuel Program and to share how biogas and renewable natural gas can contribute to the state's transportation sector decarbonization goals.

Avoided methane crediting

Avoided methane crediting is essential to any lifecycle based clean fuel program, and the Clean Transportation Fuel Program would be hard pressed to function successfully without it. Methane is more than eighty times more potent than carbon dioxide over a twenty-year period and reducing methane emissions from manure management and organic waste represents one of the largest and most cost-effective greenhouse gas reductions available today. Clean fuel programs in California and Washington rely heavily on these reductions to achieve meaningful near-term climate targets, because avoided methane delivers large verifiable and immediate climate benefits that cannot be replicated through other pathways.

Even though California and Washington have adopted policy driven limits on avoided methane crediting windows, these limits do not reflect science-based lifecycle accounting nor the reality that methane mitigation continues for the full operational life of a digester, often twenty to thirty years or more. For New Mexico, adopting similar limits would artificially truncate real emissions reductions, reduce participation, and weaken one of the most effective tools available under the Clean Transportation Fuel Program. ABC strongly recommends that New Mexico maintain full avoided methane crediting for the entire duration that a project delivers verifiable methane reductions. Arbitrary crediting caps would prematurely cut off genuine greenhouse gas reductions, undermine the program's performance, and limit New Mexico's ability to meet the statutory objectives of the Clean Transportation Fuel Program. ABC also encourages the Board to provide clarity in the final rule that avoided methane remains a required element of lifecycle greenhouse gas accounting under the statute, consistent with the scientific foundation of the program.

Book and claim

Book and claim accounting is also an essential element of a functional clean transportation fuel program. Because renewable natural gas production rarely occurs at the same location where transportation fuels are dispensed, a book and claim system is the best, most practical and verifiable mechanism for assigning environmental attributes to end use transportation fuels. This approach prevents double counting, ensures traceability, and reflects long standing practice across United States clean fuel programs including California's LCFS, Oregon's CFP, and Washington's CFS.

Experience from these programs demonstrates that without strong book and claim accounting, participation drops sharply, project financing becomes more difficult, and the program's ability to secure adequate volumes of low carbon fuel is significantly weakened. A robust book and claim system is therefore necessary for market access, regulatory certainty, and the overall performance of the Clean Transportation Fuel Program. Restricting or eliminating book and claim accounting would fragment compliance options, raise costs, and make it substantially more difficult for New Mexico to achieve meaningful transportation sector decarbonization.

Conclusion

The American Biogas Council supports the Environmental Improvement Board's efforts to finalize a Clean Transportation Fuel Program that reflects real world emissions reductions, encourages private investment, and positions New Mexico as a national leader in transportation decarbonization. Biogas and renewable natural gas projects can deliver some of the deepest and most cost-effective climate benefits available today, and we urge the Board to preserve full avoided methane crediting and a strong book and claim framework to ensure the program's success.

We appreciate your consideration and would welcome the opportunity to discuss any element of these comments in greater detail.

Sincerely,

Jonathan Harding

Manager of State Policy
American Biogas Council

About the American Biogas Council The American Biogas Council is the voice of the US biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent more than 400 companies in all parts of the biogas supply chain who are leading the way to a better future by maximizing all the positive environmental and economic impacts biogas systems offer when they recycle organic material into renewable energy and soil products. Learn more online at www.AmericanBiogasCouncil.org, Twitter [@ambiocouncil](https://twitter.com/ambiocouncil), and [LinkedIn](https://www.linkedin.com/company/ambiocouncil).