



EPAC

The Explorers and Producers
Association of Canada™
*L'Association des Explorateurs
et Producteurs du Canada^{MC}*

January 31, 2022

Ms. Marie Johnson
Specialist, Air Emissions
BC Oil and Gas Commission
PO Box 9331 Stn Prov Govt
Victoria BC V8W 9N3

Via email (marie.johnson@bcogc.ca)

Dear Ms. Johnson,

I am writing on behalf of the Explorers and Producers Association of Canada (EPAC), which represents more than 30 upstream natural gas and oil producers with assets in the province of British Columbia.

EPAC appreciates the opportunity to provide input into the province's review of the *Drilling and Production Regulation* (the regulation) as it relates to efforts at reducing methane emissions from the sector to meet the province's 2025 targets.

The recently released findings of the Government of Canada's *Review of Canada's Methane Regulations for the Upstream Oil and Gas Sector* indicates the country is on track to meet its commitment of reducing methane emissions from the sector by 40-45 per cent over 2012 levels by 2025 with 39 per cent or emissions directly attributable to federal and provincial regulations.

Although the Government of British Columbia has not released its data publicly, the federal report serves as proof of the effectiveness of the regulation given that it was found to exceed the federal policy intent when the province was granted an equivalency agreement to forgo federal regulation of methane in the jurisdiction.

As the province continues its review of the regulation, EPAC would encourage the BC Oil and Gas Commission to consider the opportunity to find efficiencies with respect to leak detection and repair (LDAR) on low-risk assets, such as well sites, so that industry and regulator efforts can be directed at higher risk sources. This approach is supported by academic research that was recently presented to industry and environmental non-governmental organizations.

In addition, EPAC would encourage the Commission to explicitly permit alternative LDAR approaches that use technology to achieve policy objectives at reduced costs to industry. This approach would also allow for regulatory flexibility in an area where technology is quickly evolving and prevent the need to frequently revisit the regulation.

Finally, EPAC would encourage the Commission to reconsider its recent decision to move up the timing of LDAR reporting from May 31 to March 31, 2022. This change, at a late date, will place a significant burden on producers and risks increasing error rates in reporting.

Thank you again for the opportunity to engage on this important file. EPAC looks forward to continued dialogue with the Commission and Government of British Columbia more broadly as the review is conducted.

Sincerely,



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CC:
Sean Curry, Vice-President, Operational Policy and Environment