



December 31, 2020

Via e-mail to: syawanarajah@edf.org

Shareen Yawanarajah
Senior Policy Manager, Global Energy
Environmental Defense Fund
301 Congress Avenue, Suite 1300
Austin, Texas 78701

Dear Shareen Yawanarajah,

Re: Application Checklist for Alternative Fugitive Emission Management Programs in B.C.

The Drilling and Production Regulation (DPR) allows for two types of leak detection surveys, comprehensive surveys and screening surveys. The type of survey required and its frequency, which varies from one to three times per year in B.C., is primarily dependent on the facility type and, in the case of wellsites, whether the production is conventional or unconventional. Comprehensive surveys must be done using either U.S. EPA Method 21 or with optical gas imaging (OGI) in accordance with procedures outlined in the Commission's technical guidance. Screening surveys may be conducted using audial-visual-olfactory (AVO) methods or by using a soap solution.

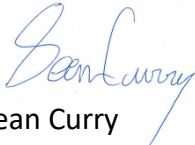
Collectively, the leak detection technologies employed, the work practices used, survey frequencies, and data management together form a fugitive emissions management program (FEMP). The current state is prescriptive regulatory requirements with allowances for permit holders to implement alternative approaches through exemption. However, there is currently no process in place for the BC Oil and Gas Commission (Commission) to receive or evaluate exemption requests for alternative FEMP.

It is anticipated that the DPR will be amended to respond to developments in leak detection technology and quantification, our understanding of fugitive emissions, and the effectiveness of different methods for leak detection and quantification. However, in the interim, a framework is needed for the Commission to review and evaluate short-term alternative FEMP so that permit holders in B.C. may apply for and, if they meet certain criteria, receive exemptions from provisions 41.1 (2), (3), (5) and (6) of the DPR in accordance with section 4(1)(m.1) of the DPR. Consequently, the Commission proposes to develop an application process for permit holders to apply to the Commission for short-term programs based on the application process currently in place in Alberta, amended to meet the needs of B.C.

The attached draft application checklist has been prepared by the Commission and we are sharing the draft with you so that you may review it and provide feedback. We ask that your written responses be received by the Commission no later than February 1, 2021. Please note that the draft checklist, written feedback received, the final checklist, and this letter will all be posted on the Commission's website.

We look forward to working together with you to achieve the Government of B.C.'s methane emission reduction target of 45% by 2025.

Sincerely,

A handwritten signature in blue ink that reads "Sean Curry". The signature is written in a cursive style with a long, sweeping underline.

Sean Curry
Vice President, Operational Policy & Environment
BC Oil and Gas Commission