



# BC Methane Regulations

INDUSTRY ORAL SUBMISSION

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## Facility Definition

- Methane regulation sections of the Drilling and Production Regulation (DPR) only apply to facility permit holders
- Zone of connection between facilities and pipelines not always defined
- TC Energy recommends revisions to the facility definition exclusions, such that “facility” does not include “a pipeline or valves specifically related to the operation of a pipeline, or any appurtenances related to a pipeline’s function or safe operation”



# Gas Destruction Equipment

- There are few descriptions of acceptable emissions mitigation measures
- Flaring is defined as an acceptable measure under certain circumstances, while incineration is not explicitly defined
- TC Energy recommends that the language of sections 52.04(2) and 52.05(4) be expanded to provide both flaring and incineration as acceptable mitigation measures



# Venting

- There are potential venting cases where there is overlap between pipeline and compression facility depressurizations
- Additional definition on venting cases and expectations would be helpful



## Pneumatic Devices

- Application of no-bleed pneumatic devices on transmissions systems is still limited given safety requirements
- Gas hydraulic actuator can be paired with gas conservation or destruction equipment, but there are technical challenges to connected the actuator's small auxiliary pneumatic devices
- TC Energy recommends
  - Small pneumatic devices (e.g., solenoid valves, pressure pilot valves, regulators and relief valves) be clearly exempted from the DPR
  - Considerations for a site-level threshold of permissible emissions from pneumatic devices





## Compressor Venting

- The vent rate associated with dry gas seal (DGS) compressors is directly related to their size
- TC Energy's compressor fleet is comprised of units that are greater than 20 MW
- The proposed limits on compressor venting in the DPR are difficult to achieve with currently available technology
- TC Energy encourages the BC OGC to continue to offer mitigation options that involve both gas conservation and destruction equipment to fulfill the DPR's compressor requirements

# Summary



Consider revisions to the facility definition exclusions



Expand language of acceptable mitigation measures to include all gas destruction technologies (flaring, **incineration**, enclosed vapour combustors)



Consider additional definition on **venting** cases



Consider exempting small **pneumatic devices** and/or site-level pneumatic device venting threshold



Continue to include gas conservation and destruction technologies as acceptable mitigation options for **compressor venting**