

Marie Johnson
Specialist, Air Emissions
B.C. Oil & Gas Commission
PO Box 9331 Stn Prov Govt
Victoria, B.C.
Canada V8W 9N3

February 1, 2022

Sent via email to: Marie.Johnson@bcogc.ca

Re: Written submission in response to the B.C. Oil & Gas Commission's request for feedback on the B.C. Methane Regulation Review

Dear Ms. Johnson,

Tourmaline is pleased to provide the B.C. Oil & Gas Commission with our perspective regarding the B.C. Methane Regulation Review for the oil and gas sector.

As Canada's largest natural gas producer, with operations in British Columbia and Alberta, we believe that continuing to develop Canada's resources in the most responsible and sustainable manner is important not just for all Canadians but for the world. Canadian natural gas can play a major role in helping to reduce emissions both domestically and globally.

At Tourmaline, we are striving to produce the cleanest and lowest-emission natural gas in the world. We reduced our methane emissions by 26% between 2018 and 2020, surpassing the 25% target we had originally aimed to meet by 2023. Tourmaline has partnered with the Natural Gas Innovation Fund and others to launch the first Emissions Testing Centre (ETC) at a live operating facility in Canada, where cleantech companies can test and validate their methane emissions-reducing technologies. We are actively applying learnings from the ETC across our operations in B.C., allowing us to develop zero-emissions well sites, transition from the use of pneumatic pumps to electric pumps and implement new technologies to detect and repair methane leaks quickly and effectively.

We believe the current methane regulations are incentivizing the oil and gas industry to reduce methane emissions and creating the intended outcomes. Overall, the policies are working.

However, given our feedback has been requested as part of the Methane Regulation Review, we would ask the B.C. Oil & Gas Commission consider Tourmaline's position on the following:

1. The regulation requires Leak Detection and Repair (LDAR) surveys at gas plants and well sites three times per year. Tourmaline has found the tests at gas plants to be productive and effective, however questions the efficacy of testing well pads three times per year; 2020 results suggest that leaks at well sites accounted for 6% of total emissions measured in LDAR surveys. Rather than conduct LDAR surveys at low-risk sites, we are requesting a policy shift that would allow industry to reallocate those resources into deploying alternative detection methods and focusing OGI surveys at larger emission sources.

Recent data has proven that newer technologies, such as fixed-wing methane surveillance and continuous monitors, are much more efficient and effective at detecting leaks. As such, Tourmaline asks that the revised regulation explicitly permit the use of alternative LDAR technologies with clear direction on how they can be implemented and when/where they can replace current requirements.

2. Tourmaline is eager to provide the BC Oil & Gas Commission with accurate and fulsome data. With the deadline changed from May 31, 2022, to March 31, 2022, the task will be difficult. We are asking for more time to submit our data.
3. The effort to collect data is significant and costly, and the amount of data being requested continues to increase. Tourmaline requests that the commission revisit the data field collected and only collect the data that is directly being used to deliver the desired outcomes.

Tourmaline will continue to relentlessly pursue reductions in methane emissions and improvements in all areas of our environmental performance. We are passionate about creating a cleaner tomorrow and are well on our way to producing the lowest-emission natural gas in the world.

Thank you for considering our perspective as you proceed with the review. We believe the natural gas sector is making strong progress towards meeting B.C.'s and Canada's emissions reduction targets. We would welcome the opportunity to discuss our feedback with you and your team.

Sincerely,



Scott Volk
Technology and Innovation Lead, Tourmaline Oil