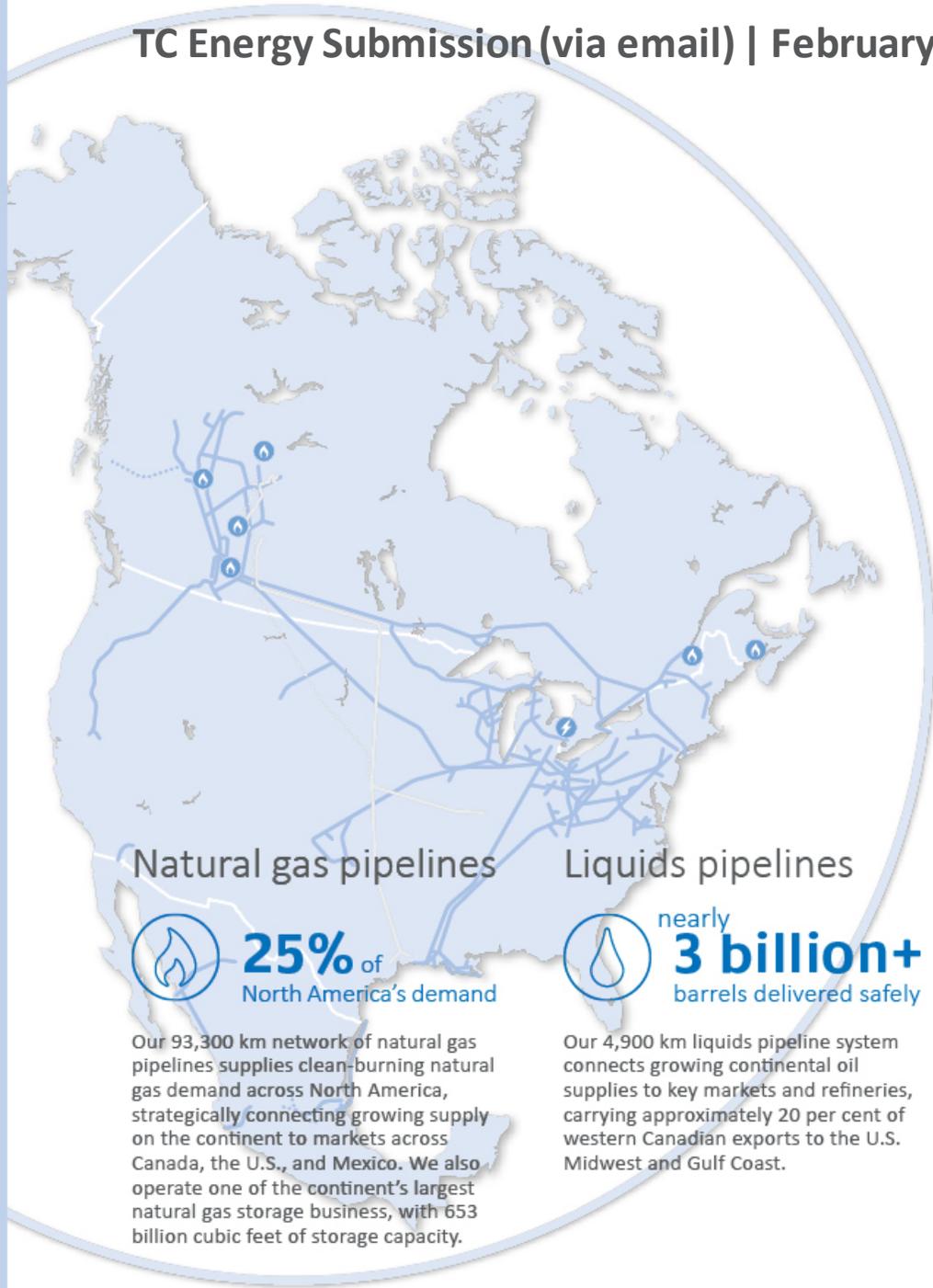


Engagement on British Columbia's Methane Reductions

TC Energy Submission (via email) | February 1, 2022



Natural gas pipelines

 **25%** of North America's demand

Our 93,300 km network of natural gas pipelines supplies clean-burning natural gas demand across North America, strategically connecting growing supply on the continent to markets across Canada, the U.S., and Mexico. We also operate one of the continent's largest natural gas storage businesses, with 653 billion cubic feet of storage capacity.

Liquids pipelines

 **nearly 3 billion+** barrels delivered safely

Our 4,900 km liquids pipeline system connects growing continental oil supplies to key markets and refineries, carrying approximately 20 per cent of western Canadian exports to the U.S. Midwest and Gulf Coast.

Power and storage

 **4 million+** homes powered

We own or have interests in seven power generation facilities with combined capacity of approximately 4,200 megawatts, roughly 75 per cent is emission-less energy.

General Comments to BC Oil and Gas Commission

TC Energy writes in response to the British Columbia Oil and Gas Commission (BC OGC) engagement on methane regulation.

At TC Energy, we recognize the importance of addressing climate change and the significant undertaking necessary to transition our economy to a low-carbon future. In October, TC Energy [announced](#) new targets to reduce GHG emissions intensity from its operations 30 per cent from 2019 baseline year by 2030 and to position the company to achieve net-zero emissions from our operations by 2050. The company's new GHG Emissions Reduction Plan shares five key focus areas and a [roadmap](#) to support achieving net-zero by 2050.

TC Energy is playing a proactive role to support positive change – embracing the energy transition that is underway and contributing to a lower-emission energy future. In doing so, TC Energy can play a key role in helping British Columbia reach its climate targets and manage methane in a way that supports workers, communities and the competitiveness of the economy now and into the future.

Since early 2020, Coastal GasLink has engaged with the BC OGC to clarify its understanding of the new methane sections of the Drilling and Production Regulation (DPR). TC Energy submits the following with respect to the potential amendment of the DPR and for future discussion.

- The OGC issues separate **facility permits** and pipeline permits; however, the delineation of these permits is not always well defined and may create situations of competing requirements.
- There are few descriptions of acceptable emissions mitigation measures. Although flaring is defined as an acceptable measure under certain circumstances, **incineration** is not explicitly referenced.
- There are potential **venting cases** where there is overlap between pipeline and compression facility depressurizations or unplanned releases. These cases are not yet acknowledged in the DPR or the Flaring and Venting Reduction Guideline.
- The application of **no-bleed pneumatic devices** on transmissions systems is still limited given safety requirements.
- The option to continue to use gas conservation or destruction equipment on **compressor venting** is key until the limits imposed can be successfully achieved with future technology

TC Energy appreciates the opportunity to provide feedback to BC OGC as it looks to refine its existing methane regulations. We look forward to further discussion and BC OGC's ongoing work via the contact below as appropriate.

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