

February 1, 2021

Sean Curry
Vice-President, Operational Policy & Environment
BC Oil and Gas Commission
PO Box 9331 Stn Prov Govt
Victoria, BC V8W 9N3
via email: Sean.Curry@bcogc.ca

Dear Sean:

Re: Draft BC alt-FEMP check list

The Canadian Association of Petroleum Producers (CAPP) appreciates the opportunity to provide comments on the draft check list for the *BC alternative methane fugitive emissions management plans/programs (alt-FEMP)*. The check list clearly defines the minimum information needed by the BC OGC to review applications to implement an alt-FEMP. We commend the BC OGC's alignment of the alt-FEMP check list with Alberta's alt-FEMP check list for continuity and content. Our members look forward to implementing alt-FEMPs in BC and we support the checklist's design and intent. To support the efficient roll out of alt-FEMPs and the use of the proposed checklist, we recommend that the following requirements are further clarified:

Technology Details:

Describe quality assurance/quality control procedures.

- Please clarify what is meant by this requirement and how it differs from the requirement to "describe instrument maintenance and calibration requirements". In many cases, "maintenance and calibration" is part of "quality control and assurance" so further guidance may allow these requirements to be amalgamated.

Describe data quality indicators for precision and bias.

- Please provide additional clarity regarding what is expected, ideally with example(s).

Describe how leaks will be measured and quantified.

- Many alternative methane detection technologies do not distinguish leaks from vents, thereby requiring site-specific analysis and investigation once emissions are detected. For

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additional clarity, we recommend changing this requirement to “Describe how leaks will be identified and quantified.”

Indicate whether or not the technology or proposed program is currently in use in other jurisdictions and list all jurisdictions that apply. Provide copies of approvals, if applicable.

- Proposed technologies may be used by various operators in multiple jurisdictions and the applicant may not be privy to all information. Similarly, programs which have been approved in alternative jurisdictions will likely have been designed to meet that jurisdiction’s regulatory requirements and may not be applicable to BC. In many instances approaches and approvals from alternative jurisdictions may serve to complicate, rather than clarify BC applications; we therefore recommend that this requirement be explicitly optional.

Fugitive Emissions Reduction Assessment:

Explain the volume of reduction that would be achieved by completing surveys with a portable analyzer or optical gas imaging camera used in accordance with the DPR and associated technical guidance.

- In recognition that applicants will be proposing approaches for the management of future emissions, we recommend changing the requirement to “explain the *estimated* volume of reduction.”

With additional clarity provided in accordance with the above recommendations, we are supportive of the intended use of the BC alt-FEMP check list. We believe that it provides industry with a greater understanding of what is needed in order to apply for an alt-FEMP. We look forward to your responses to the above and to it being completed and finalized as soon as possible. If you have any questions regarding the above, please contact Don McCrimmon at don.mccrimmon@capp.ca.

Sincerely,



Geoff Morrison
Manager, BC Operations
Canadian Association of Petroleum Producers