



Sean Curry, Vice President, Operational Policy & Environment  
B.C. Oil and Gas Commission  
2950 Jutland Rd  
Victoria, B.C., V8T 5K2

05 April 2019

**Re: Draft guidance work plan for the implementation of methane regulations**

Dear Mr. Curry;

Canadian Energy Pipelines Association (CEPA) would like to thank you and your colleagues for providing our member companies with an update on the BC Oil and Gas Commission's (BC OGC) draft methane guidance documents on February 22. CEPA appreciates the direction the BC OGC has taken by preparing a guidance document that will assist our member companies in navigating the intentions of BC's methane regulations.

CEPA and its members have had an opportunity to review the draft Guidelines and believe there is a need to provide greater flexibility to the application of the fugitive emissions management in BC. To meet this objective CEPA recommends the following:

1. Annual Leak Detection and Repair Summary Reports deadlines should be extended to June 1. Currently, the timeline for annual reporting is February 1, 2021 for the 2020 reporting year. This allows only one month for reporting, which is very aggressive.
2. LDAR data should be compiled and reported once per year based on the proposed reporting deadline of June 1. Industry should provide records of the LDAR activities for licensed assets should the OGC request the data for compliance assurance/inspections. The proposed reporting of LDAR records within 30 days of each comprehensive survey is onerous and duplicative with the proposed Annual LDAR Summary Report. Based on the regulated LDAR frequency, industry would be continuously reporting records to the commission through eSubmission only to report the same records in the annual summary report.
3. The frequency of comprehensive surveys should be prorated based on the run times of a facility operation in a calendar year. Should a facility not operate for a specified time in a year, the frequency of survey should be adjusted accordingly.
4. Performing LDAR activities during pre-commissioning inspections of new facilities or equipment should be considered as an effective option to the *Post Construction* survey requirements.
5. The term "major modification" under the *Post Construction* section should be defined to clarify and support when a unique comprehensive survey is warranted above and beyond the existing FEMP schedule. Pending the definition of major modifications, we feel the regulated frequency of comprehensive surveys for brownfield sites (i.e., three comprehensive surveys per year) sufficiently addresses potential fugitive emissions from those modifications. Unique comprehensive surveys following minor and most major modifications to brownfield facilities should be excluded.
6. Alternative FEMP guidance should be focused on achieving equivalency of fugitive emissions management based on outcomes of a proposed program through a risk-based approach. We



agree that proponents will need to demonstrate the effectiveness of alternative approaches, however, the prescriptive data that is required in the proposed guidance may or may not be suitable for all Alternative FEMP's. We recommend the OGC outline the process for applying and achieving an acceptable Alternative FEMP with an outline of what data "may" be required as part of an application.

7. Consider including guidance on record retention timelines. Due to the volume and file size of the records that will be collected throughout the FEMP, a minimum expectation of record retention (i.e. two years) would be appreciated to allow industry to effectively manage records and electronic storage capacity.
8. The content of the FEMP records and reporting requirements should to be aligned and supportive to the conditions of equivalency between the province of BC and the federal government.

In addition to the above, CEPA is encouraged by the recent release of the equivalency agreement with the federal government and would welcome the opportunity to work with the OGC to ensure the FEMP guidance document will support the conditions of equivalency.

If you have any questions or concerns regarding the above recommendations, please do not hesitate to contact me at 403.221.8755 or by email at [khorsfield@cepa.com](mailto:khorsfield@cepa.com).

Yours sincerely,

Kai Horsfield  
Manager, Regulatory and Policy