



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

28 January 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Re: Draft guidance work plan for the implementation of methane regulations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you and your colleagues for providing our member companies with an update on the BC Oil and Gas Commission's (BC OGC) draft guidance work plan for the implementation of methane regulations. Given the potential impact of the provincial regulation, and the uncertainty regarding harmonization/equivalency with regulations in other jurisdictions, we encourage the BC OGC to work with their federal/provincial counterparts and industry to ensure pathways to compliance are achievable, consistent with other jurisdictions and remain focused on being outcome based.

We are supportive of the BC OGC's draft work plan and would welcome all opportunities to participate in the development of upcoming guidance. CEPA appreciates the direction the BC OGC is taking by preparing a guidance document that will assist our member companies navigate the intention of the BC regulation. The midstream oil and gas sector is complex and diverse. Our member companies are interested in continued discussions regarding the potential for achieving the province's methane reduction goals through a performance-based approach, which offers a more efficient, measurable and cost-effective means to achieving methane reductions.

With the above in mind, CEPA would like to meet with you and your staff to better understand how we can support this important initiative. Please contact Gillian Dawe (gdawe@cepa.com) to set up a time and date that works best for you.

Sincerely,

Kai Horsfield
Manager, Regulatory and Policy
Canadian Energy Pipeline Association

Cc: Marie Johnson, Specialist, Air Emissions