Comparison of Methane Regulations in Different Jurisdictions in North America

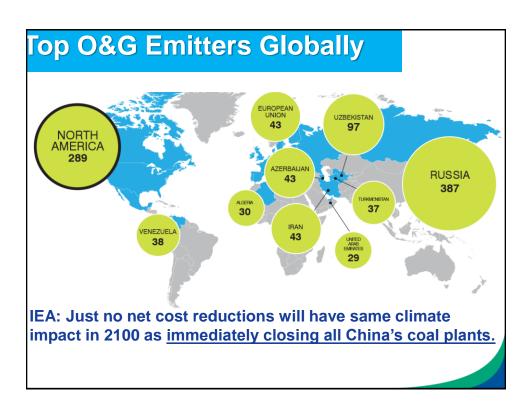
Methane Emissions in the Canadian Oil and Gas Sector – Current Science and Policy Implications

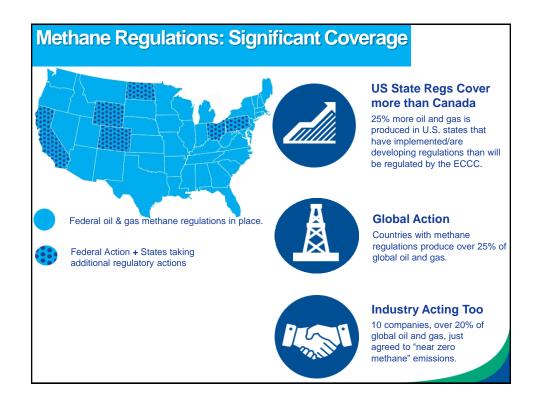
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Overview

- Many jurisdictions are focused on regulating oil and gas methane emissions.
- Common elements across these regulatory and company-specific actions.
- Reducing methane:
 - Clear climate benefits
 - Significant co-benefits for improved air quality
 - Reduces investment risk
 - Can help ensure a growing gas market





Best Practices Across Leading Jurisdictions

Across jurisdictions, key areas of best practices are emerging:

- 1. Prioritize gas capture and minimize flaring
- 2. Comprehensive, frequent LDAR
- 3. Eliminate or minimize venting
- 4. Monitoring, reporting, and enforcement

Innovation!

1. Gas Capture and Flare Minimization

- Norway: Routine flaring not permitted. Operators required to meter and report daily gas flared
- US Bureau of Land Management: Operators must capture and use or route to pipeline a percentage of what they produce; Declines over time, 2026 must capture 98% of gas produced.
- North Dakota: Gas Capture targets were set as an increasing percentage over several years: as much as 95% by 2020.
- California: (Tank, pneumatic & compressor requirements)

2. Comprehensive, Frequent LDAR

Jurisdictions that require LDAR 4 times a year in some capacity:

- BLM
- California
- Colorado
- OH
- PA
- UT
- Wyoming

Canada is proposing 3 times a year due to winter conditions.

3. Eliminate or Minimize Venting

BLM: No bleed pneumatic controllers and pumps at gas processing plants. Minimize venting and the need for venting; must consider alternatives to manual venting and determine they are infeasible.

California: New zero bleed pneumatics and pumps. Route compressor emissions to vapor recovery or measure and rep

Colorado: STEM. Zero bleed pneumatics where grid electricity.

Canada: Zero bleed pneumatics and pumps at compressor stations and processing plants. No venting from new compressors

Monitoring, reporting, and enforcement

CO/CA/Canada: Continuous monitoring or incentives for continuous monitoring.

CO/BLM: Certification of design and operation.

CO/CA/BLM: Annual reporting accompanied by certification of compliance.

Rules are Highly Cost Effective California: \$19-\$21 per 70% **Average Annual Natural Gas** MT CO2e reduced **Production Growth Relative to 2013** Canada: Net benefits of \$11.7 billion/Total costs States implementing O&G regulations of \$3.3 billion. ICF: 2014: Ohio. Utah, and \$6.78 CAD/ton CO2 Colorado implement O&G regulations Colorado: 42.4 million in net costs annually 10% Other BLM: \$46 - \$204 net states benefits annually 2013: Pennsylvania **IEA**: 75% globally, up to 2/3rd no net cost