

# Strategic Compliance with Federal and Provincial Methane Reduction Regulations

Presented by Dani Urton  
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# Presentation Overview

- Regulatory Update
- Equivalency
- COVID-19 and Regulatory Suspensions
- Methane Requirements
- Fugitive Emissions
  - Provincial & Federal Differences
  - Responsible Party, Methods
  - Frequency Requirements
  - Records, Reporting
- Challenges
- Strategic Compliance
- Questions

# Regulatory Background

Canada's National Climate Plan



Government of Canada's Methane Regulations  
SOR/2018-66  
Released April 2018, In Effect January 1, 2020



CEPA Equivalency Provisions



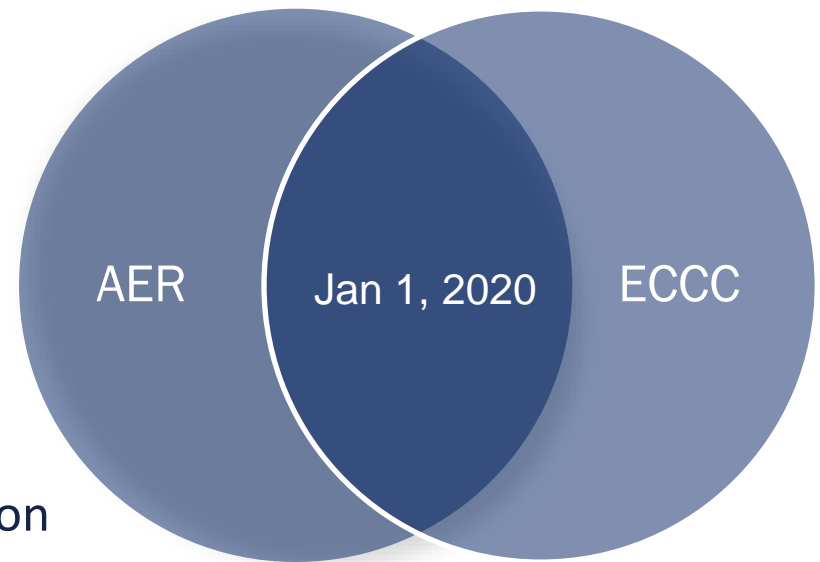
Alberta Energy Regulator  
Updated Directive 060, 017; Manuals 015, 016  
Released December 2018, In Effect January 1, 2020



May 2020 – Updates to Directives 060, 017  
June 2020 – Draft Equivalency Announced

# Equivalency

- Regulatory process:
  - Negotiation of equivalence
  - Public comment period
  - Equivalency agreement
  - Order to stand down federal regulation
- British Columbia – Equivalency finalized April 4<sup>th</sup>
- Saskatchewan – Draft equivalency published May 16<sup>th</sup>
- Alberta – Draft equivalency published June 6<sup>th</sup>



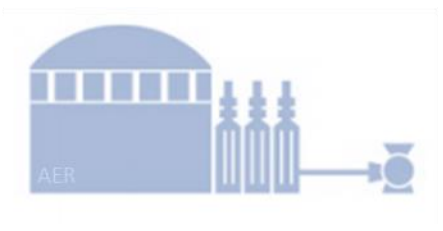
# COVID-19 and Regulatory Suspensions

- Provincial – temporary suspension for triannual fugitive emissions surveys
  - Alberta Energy – Ministerial Orders, April 9<sup>th</sup> and 14<sup>th</sup>
  - AER – Decisions 20200520A and B, May 20<sup>th</sup>
- Federal – non-application of LDAR requirements, dependent on facility-specific conditions
  - May 25<sup>th</sup> Announcement



# Methane Requirements

- Facility venting limits
- Equipment-specific venting limits
  - Compressor seals
  - Pneumatic devices
  - Pneumatic pumps
  - Glycol dehydrators
- Fugitive Emissions Management Program (FEMP)/  
Leak Detection and Repair (LDAR)



# Provincial & Federal Differences

## Fugitive Emissions – Comparing Regulations

- Responsible Party
- Inspection Methods
- Leak Definition
- Frequency Requirements
- Reporting, Record Keeping



# Responsible Party



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- **Duty holder** – FEMP
  - OSCA Approval Holder
  - PA Licence or Approval Holder, or
  - Operator where licence/approval not required under OGCA
- **Operator** – Reporting
- **Operator** for an upstream oil and gas facility – LDAR program and record keeping



# Inspection Methods



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## Fugitive Emissions Surveys (Facilities):

- Optical Gas-Imaging, Method 21

## Fugitive Emissions Screenings (Wellsites):

- Audio/Visual/Olfactory, Soap Solution, FE Survey Methods

## LDAR Inspections

### (Facilities and Wellsites):

- Optical Gas-Imaging, Method 21



# Leak Definition



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## Fugitive Emission:

- Unintentional release of hydrocarbons to the atmosphere, which, when measured using US EPA Method 21, has a hydrocarbon concentration  **$\geq 10\ 000$  ppm**
- Repairs required within 30 days (temporarily suspended)

## Leak:

- A release of hydrocarbons from an equipment component consisting of  **$\geq 500$  ppmv** of hydrocarbons, measured in accordance with EPA Method 21
- Repairs required within 30 days

# Frequency Requirements



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## Fugitive Emissions Management Program

- One survey/year – all in-scope facilities
- Three surveys/year – sweet gas plants, sweet compressor stations, controlled tanks
- One screening/year – wellsites
- Alternative FEMP options

## Leak Detection & Repair Program

- Three surveys/year – all in-scope facilities and wellsites
- Alternative LDAR options

# Record Keeping & Reporting



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## Reporting

- Annual Methane Report
  - OneStop

## Record Keeping

- Documented FEMP
  - Plans, procedures, techniques, training, data management
- Fugitive Emission Survey records
- Inventory records

## Registration

- Was due April 30, 2020

## Record Keeping

- Equipment calibration records
- Inspection records
- Leak records
- Repair records

# Strategy – Scope & Schedule

## Challenge:

Determining in-scope list of assets for LDAR program

## Solution:

- Assess asset list and inspection obligations
- Create priority list of sites

## Challenge:

Scheduling based on different inspection requirements

## Solution:

- Phased scheduling
- Assess risk tolerance
- Make note of AER updates

# Strategy – Data Management

## Challenge:

Different reporting and record-keeping requirements

## Solution:

- Compliance-based data collection template
- Software options
- Equipment inventory assessment

# Strategy – Alternative LDAR

## Challenge:

Repair verification requirements

## Solution:

- Consider Federal Alternative LDAR Notification

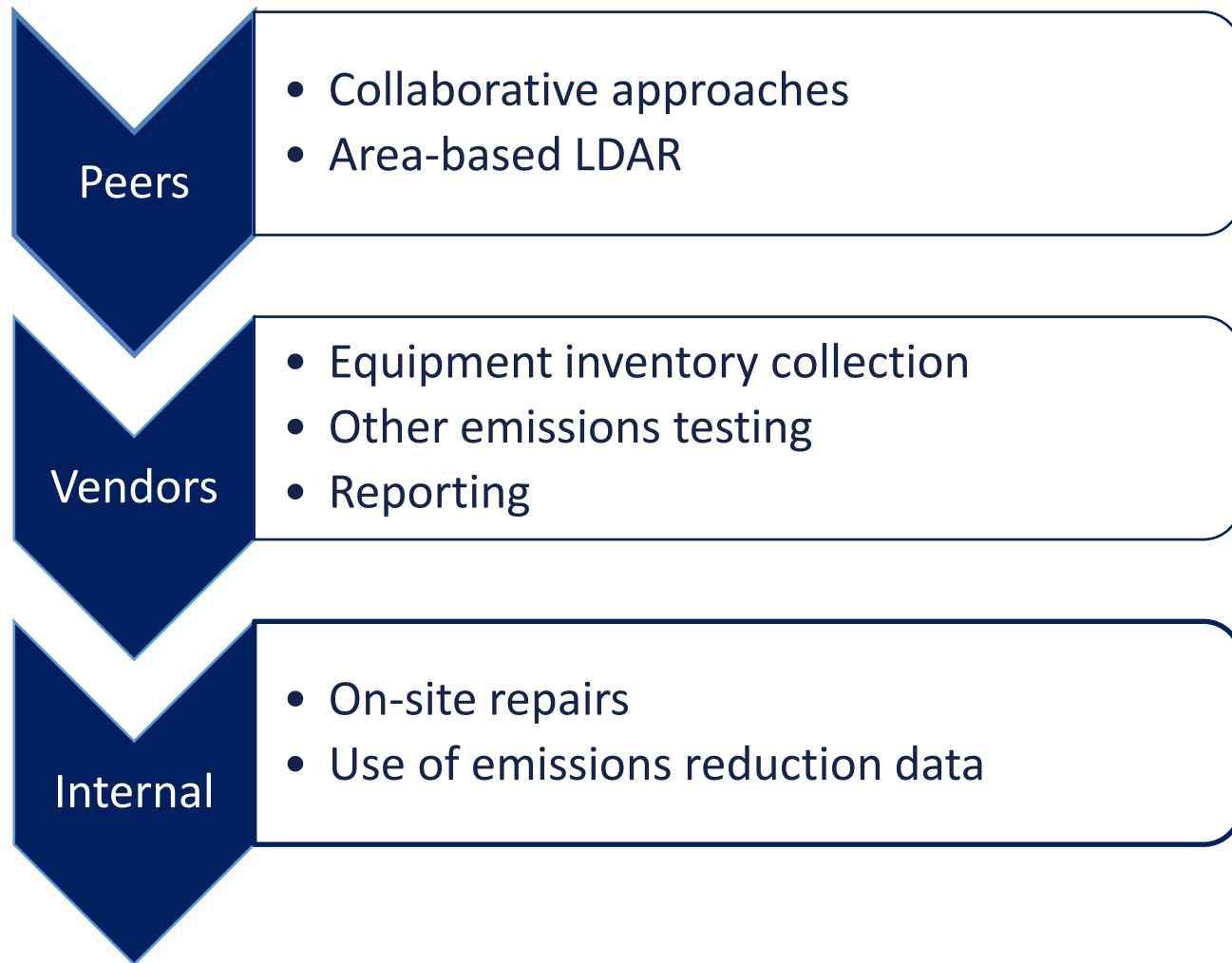
## Challenge:

Lack of baseline data

## Solution:

- 2020 baseline

# Strategic Use of Resources





# Questions? Thank You!

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