



F. Jonathan Rice
Department of Natural Resources
Office of Conservation, Environmental Division
617 North Third Street, Room 874-D
Baton Rouge, La 701802

April 19, 2023

In re: Reference Docket No. **R. A. 2023-13**

We submit these comments on behalf of members of the Interfaith Center on Corporate Responsibility (ICCR), a global coalition of faith-based and values-driven institutional investors that have been engaging oil and gas companies since at least 2007 on the need to reduce methane emissions. ICCR's membership comprises over 300 organizations, which include faith-based asset owners, values-based asset management companies, pension funds, endowments, and other institutional investors that collectively represent over \$4 trillion in invested capital. ICCR commends the Louisiana Department of Natural Resources for taking steps to address methane waste from the oil and gas industry through proposed rule amendments to limit venting and flaring.

Investors are concerned about all aspects of sustainability for the energy sector but are especially concerned about methane as it is such a powerful climate change forcer. As long-term and diversified investors, we are deeply concerned about the impact of climate change on the broader economy, on the companies in which we are invested, and on communities across the world that will bear the impacts of climate change. ICCR's membership includes faith-based health systems and congregations with ministries in communities affected by oil and gas operations, so we are also concerned about the harmful impacts of methane and VOC emissions on public health.

When methane is released through venting and flaring, it represents lost product and earnings for oil and gas companies, a stated concern for investors. In 2019, oil and gas producers in Louisiana reported that 5.18 billion cubic feet of natural gas was lost due to venting and flaring, valued at nearly \$16 million. ICCR supports strong, commonsense regulations that would end the wasteful and avoidable practice of routine venting and flaring and limit allowable venting and flaring of natural gas to instances where it is necessary due to emergencies or maintenance.

Flaring reduction has been a [priority ask](#) from investors in dialogues as well as in resolutions filed with companies at least [since 2016](#). Cost-effective solutions are available to capture this product and put it to beneficial use while reducing climate and air quality impacts. For example, well-managed companies with whom investors have engaged have adopted commitments to ensure gathering operations are in place before they start drilling, obviating the need for routine flaring.

Climate change poses severe and pervasive risks to the economy, financial system, and society at large. While we recognize voluntary efforts from leading members of the oil and gas industry to curb methane waste, robust government regulations are needed to address this systemic risk, reduce greenhouse gas emissions in a uniform manner, and support companies' net-zero transitions.

We encourage LDNR to continue its efforts to update its rules to address energy waste from the practice of venting and flaring and look forward to additional public participation opportunities. Reducing methane pollution from the oil and gas industry is widely recognized as a cost-effective and pragmatic way to slow climate change while mitigating transition risks in oil and gas investments. Additionally, implementing measures to reduce methane pollution will result in a co-reduction of health-damaging air pollutants, which are released alongside methane and have detrimental impacts on the well-being of both workers and communities, according to recent studies conducted by the [Clean Air Task Force](#) and [PSE Healthy Energy](#).

By acting to curtail methane waste, the State of Louisiana and LDNR can achieve valuable greenhouse gas reductions while helping American industries become cleaner and more competitive.

Thank you for your consideration,

A handwritten signature in cursive script that reads "Christina C. Herman".

Christina C. Herman
Senior Director,
Climate Change & Environmental Justice
Interfaith Center on Corporate Responsibility (ICCR)