

April 20, 2023

Louisiana Department of Natural Resources  
Office of Conservation  
Engineering Regulatory Division  
617 North Third Street, Room 927  
Baton Rouge, LA 70802

Re: bp Comments for Announcement Statewide Order No. 29-B (LAC 43:XIX.3503 and LAC 43:XIX3507)

Mr. F. Johnathan Rice:

BPX Operating Company (“bp”) appreciates the willingness of the Louisiana Office of Conservation to solicit feedback from interested stakeholders to identify, assess, and recommend opportunities and best practices to reduce venting and flaring in Louisiana.

In Louisiana, there is a history of industry innovation and leadership, and we believe there is a real opportunity for the state to raise the bar for others to follow to address methane emissions. Most notably, we support the state’s effort to eliminate the routine flaring of natural gas. In our own US onshore operations, we are already well on our way to eliminating routine flaring by 2025.<sup>1</sup>

As the Office of Conservation assess next steps, we recommend four guiding principles for consideration as a policy framework to support the achievement of its objective to reduce venting and flaring. These principles include:

- (1) **Incentivizing continuous improvement** efforts that link ambitions to real outcomes by measuring interim and long-term progress.
- (2) **Improving venting and flaring data** to enhance transparency and inform progress.
- (3) **Enhancing regulatory oversight** through standards and regulatory mechanisms that incorporate assurances to reduce venting and flaring consistent with Louisiana’s 2022 Climate Action Plan recommendations.
- (4) **Facilitating collaboration with midstream entities and other key stakeholders** that fosters collaborative action, which is essential to ensure sufficient midstream infrastructure is in place and available.

While we are not commenting on specific phrasing, definitions, and proposals within the Potpourri notice, given the variety of operational and development activities addressed in the language, we recommend the Office of Conservation consider a robust stakeholder engagement process prior to any proposed rules. This will ensure that Louisiana’s unique resource base, existing regulations, and proposed state rule changes are considered against newly proposed federal rules aimed at addressing methane emissions from new, modified, and existing sources.

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<sup>1</sup> [https://www.bp.com/en\\_us/united-states/home/news/features-and-highlights/bp-aims-for-zero-routine-flaring-in-us-onshore-operations-by-2025.html](https://www.bp.com/en_us/united-states/home/news/features-and-highlights/bp-aims-for-zero-routine-flaring-in-us-onshore-operations-by-2025.html)

We look forward to working with the Office of Conservation and all stakeholders to address venting and flaring in Louisiana and welcome the opportunity to build upon the work that is already underway.

Respectfully,

A handwritten signature in blue ink, appearing to read 'W. Burton', with a stylized, cursive script.

Will Burton  
Vice President of HSE and Low Carbon  
BPX Operating Company