



**CENTER FOR METHANE  
EMISSIONS SOLUTIONS**

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The Louisiana Department of Natural Resources  
Office of Conservation

Re: Regulatory Amendment to Statewide Order NO. 29-B

The Center for Methane Emissions Solutions (CMES) appreciates the opportunity to submit comments on the Louisiana Department of Natural Resource's Office of Conservation proposed rule to limit the **practice of venting and routine flaring of methane** at oil and gas operations.

CMES is a national business coalition that represents the views of companies in the methane mitigation industry across the United States and in Louisiana. The methane mitigation industry is a robust and growing American industry. More than 130 companies have headquarters in the U.S., and there are more than 570 methane mitigation facilities located across the country, in 46 states, including New Mexico.

Our members commend Governor John Bel Edwards and his Administration for the thoughtful, deliberative approach undertaken to address methane emissions from oil and gas sites in the state of Louisiana. We also appreciate the important role the oil and gas industry have in the state's economy, providing thousands of quality jobs and value to communities. Unfortunately, as the industry has boomed, an increasing level of methane emissions has also been created, a highly potent greenhouse gas, over 80 times more potent than carbon in the first 20 years after it is released into the atmosphere.

In addition to the real environmental costs associated with these emissions, there is also a tremendous economic cost. Methane is the primary component of natural gas. Louisiana oil and gas operations lose millions dollars-worth of product each year due to methane emission from inefficiencies at oil and gas well sites including faulty equipment and venting practices. If those issues were addressed, it would mean more product could be brought to market and more revenue for companies and for the state. Moreover, cutting methane waste can also help ensure a fair return for royalty owners.

Fortunately, this is a problem with a clear solution. Responding to this market and environmental challenge, our member companies have developed a range of effective, innovative, and low-cost services and technologies that reduce wasteful methane emissions. But you don't have to take our word for it. In their March 2020 report entitled "Global methane emissions from oil and gas", the International Energy Agency found that "While natural gas prices today are relatively low, we estimate that around one-third of our latest estimate of methane emissions from oil and gas operations could still be avoided at no net



cost.” These results reflect our experience in other states, like Colorado and New Mexico, that have imposed proposals like the one under consideration in Louisiana.

As a result, the Conservation Department need not make a difficult choice between protecting public health and supporting the economy. It is our view, that the rule under consideration today strikes this important balance. The private sector has recognized the growing market providing answers to address venting and flaring. As such, there are numerous technology companies that provide on-site solutions that can capture the methane and is use it for a productive purpose, like supplementary power supply and useful products like methanol.

The development of these technologies means that producers in Louisiana will have flexibility in identifying low-cost, highly efficient products for their compliance strategy that best fits their business model. Further, these companies provide sustainable, high-paying jobs to Louisianians, thereby supporting the state’s economy.

The sum of these factors leads our organization to strongly support the state’s proposal. As the Office of Conservation continues its work, we welcome the opportunity to be a resource and are readily available to meet to discuss further.

Isaac Brown

Executive Director

Center for Methane Emissions Solutions

