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Louisiana Department of Natural Resources
Office of Conservation
Engineering Administrative Division
617 North Third Street, Room 927
Baton Rouge, LA 70802
Attn.: Ms. Carrie Wiebelt, Director of Engineering

Re: bp Comments for Venting and Flaring of Natural Gas (LAC43:XIX.103, 3503, 3507, 3509, 3511)

Dear Ms. Wiebelt,

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

Louisiana continues to build upon its long history of industry innovation and leadership, and we applaud the state’s effort to identify opportunities to address methane emissions, as outlined by the state’s 2022 Climate Action Plan. Most notably, we support the state’s effort to eliminate the routine flaring of natural gas. In our own US onshore operations, we are aiming to eliminate routine flaring by 2025.¹

As the Office of Conservation enters the final phases of rulemaking, we submit the following for consideration:

- **In Section 3507.A.**, bpx requests the following changes:

“The venting of natural gas from any well producing in the state of Louisiana is hereby expressly prohibited except in those instances where ~~permissible~~ routine flaring as specified in §3507.B is not an economical or safe alternative or those instances which are included as exceptions under §3509.”

¹ 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

- **In Section 3507.D.**, bpx requests the following changes:

"Any permissible flares allowed under this Subpart must be placed a sufficient distance from wells, storage tanks, and any other significant structures or objects so that the flare does not create a safety hazard."

- **In Section 3507.E**, bpx requests the following changes:

"Any permissible venting or flaring allowed under this Subpart, except in those instances which are included as exceptions under §3509, shall be reported, including measured or estimated volumes of each, on the monthly OGP and R5D."

- **In Section 3509.A.3**, bpx requests the following changes:

"venting or flaring during drilling, completion, ~~and~~ hydraulic fracturing operations, and during workover or intervention operations."

- **Section 3511.A (Violations)**, bpx requests the following changes:

"However any venting or flaring which contradicts ~~the spirit or intent of this~~ Statewide Order shall be a violation..."

We appreciate the opportunity to provide further technical comments and look forward to working with the Office of Conservation and all stakeholders to address venting and flaring in Louisiana.

Respectfully,

Craig McMillin
Vice President of HSE and Carbon