

## 4-2-2024 Bridger Photonics

### Attendees

#### EPA

- Julius Banks
- Steph Bogle
- Sarah Busch
- Mike Hannan
- Bill Irving
- Sharay Jackson-Dixon
- Sharyn Lie
- Erin McDuffie
- Julie Powers
- Vasco Roma
- Pye Russell
- Melissa Weitz

#### Bridger Photonics

- Asa Carre-Burritt
- Mike Thorpe
- Pete Roos
- Ryan Stewart

### Summary

EPA and Bridger Photonics continued their 3/22/2024 conversation on the relationship subpart W and the Waste Emissions Charge.

**Subject:** Bridger // EPA meeting follow up

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Dear Stephanie and EPA team,

Sincere thanks to you for taking the time to meet with us yesterday. In the meeting, we shared with you the industry response we're observing to EPA's rulemaking:

- The industry decisions are shifting to a focus on minimizing liability for violations and penalties (e.g. methane fee) and moving away from a focus on demonstrable emissions mitigation.

*Voluntary Emissions Reduction Efforts:*

We understood from you that, as proposed, Subpart W would penalize "other large emission events" detected through voluntary monitoring efforts. We pointed out that this structure will drive out voluntary efforts by proactive operators to detect, understand, track, and reduce their emissions. At risk, for example, is the 4.9 million metric tons of methane that Bridger detected in 2022 alone from voluntary programs (51% of EPA's estimated total 2021 US methane emissions from O&G). On the other hand, if the EPA can remove penalties for detecting emissions from voluntary programs, operators will be highly incentivized to conduct the most effective and comprehensive voluntary monitoring efforts to avoid penalties (see bullet above) and reduce their overall emissions (what we all want).

- We would like to set up a meeting with you to better understand the EPA's motivation for penalizing voluntary efforts and/or whether there are regulatory or legal constraints that make removing penalties for voluntarily collecting data challenging. Is there a legal reason that voluntary monitoring data cannot be exempted from subpart W reporting so that voluntary monitoring is not penalized?

*An Alternative Emissions Inventory Approach:*

During the meeting, we encouraged the EPA to consider an alternative approach to determining emissions inventories that will generate accurate inventories for tracking emissions from the operator scale all the way up to national scale and can be applied consistently across operators and regulatory jurisdictions. We described a well-established, peer reviewed method currently being used by individual operators in Canada and by Carleton University, funded by ECCO to baseline and track the Canadian national inventory (currently in year 3). In 2023, we took steps to further validate this method on the operator scale in the United States by scanning several large sets of facilities in back-to-back fashion (separated by ~1 week and without intervention in between). Each of ten back-to-back tests produced the same inventory results within error bars, which provides evidence that aggregate emissions inventories change slowly in time and can be determined by snapshot measurements in the

presence of intermittency (i.e. on average, disappearing leaks are reliably replaced by new leaks).

- We would like to set up a meeting with you to help figure out how to frame such methods into performance-based (i.e. technology-agnostic) rule concepts and language. We believe that if this is done well, operators will be incentivized to use more and better emissions measurements and thereby become more effective at mitigating their emissions. On the other hand, we fear that if a performance-based inventory method is not made available, operators will deploy the bare minimum monitoring (i.e. less than current level where voluntary monitoring is not penalized) and emissions will not be reduced.

I'm cc'ing Kristina here to help schedule these meetings. Again, thank you for your time today and have a wonderful weekend!

Best regards,  
Pete