

Summary of Pathways Alliance’s Submission on the [Canada Gazette, Part I, Volume 157, Number 50: Regulations Amending the Regulations Respecting Reduction in the Release of Methane and Certain Volatile Organic Compounds \(Upstream Oil and Gas Sector\)](#)

Submission Date: February 14, 2024

On December 16, 2023, the Government of Canada issued Canada Gazette, Part 1, Volume 157, Number 50: Regulations Amending the Regulations Respecting Reduction in the Release of Methane and Certain Volatile Organic Compounds (Upstream Oil and Gas Sector) (‘draft Methane Regulations’). The Pathways Alliance’s (Pathways’) feedback on the draft Methane Regulations provided in response to the Gazette 1 comment period, which concluded on February 14, 2024, can be summarized into three key areas as follows:

Fugitive Emission Source Inclusion in Baseline – Pathways understands that non-point source emissions such as mine fugitives are excluded from the mitigation requirements in the draft Methane Regulations due limited available mitigation technology options. However, non-point source emissions are included in the accounting of baseline methane emissions resulting in regulated emission sources needing to achieve greater than 75% reduction to meet the intended policy outcome. Pathways’ position is that any methane emission sources that will not be subject to the regulations should also not be included in the baseline value for the 75% target.

Prescriptive Requirements – Pathways members are committed to reducing GHG emissions, including methane. However, additional prescriptive and stringent federal methane regulations will increase costs and resources required by superseding the outcomes-based approach currently in place in Alberta. Pathways recommends that prescriptive prohibitions proposed in the draft Methane Regulations that could result in unintended consequences such as unnecessary costs and operational impacts be removed or revised to address the potential implications.

Fugitive Emission Management – The proposed fugitive emission survey frequency and repair timelines will be operationally difficult to achieve due to the size and complexity of in situ oil

sands facilities and require a substantial increase in resources to potentially mitigate a small amount of methane emissions resulting in diminishing returns. The survey frequency and repair timelines for facilities should be revised to recognize the small contribution of fugitive emissions from in situ oil sands facilities and ensure the efficient reduction opportunities are pursued.

Pathways has urged Environment and Climate Change Canada (ECCC) to revise the draft Methane Regulations to address the concerns raised in the Pathways submission as well as those from other sector experts (e.g., Canadian Association of Petroleum Producers), and work closely with provincial governments to ensure equivalent outcomes-based approaches for methane regulation can be implemented.