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August 21, 2023

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:

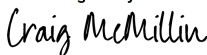
"venting or flaring during drilling, completion, ~~and~~ hydraulic fracturing operations, and during workover or intervention operations."

- **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,

DocuSigned by:


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Craig McMillin

Vice President of HSE and Carbon



**COMMENTS ON THE OFFICE OF CONSERVATION'S NOTICE OF INTENT TO
AMEND LAC 43:XIX, Subparts 1 and 15.**

Environmental Defense Fund (“EDF”) by and through the undersigned, greatly appreciates the opportunity to submit the following comment on the Louisiana Department of Natural Resources ("the Department"), Office of Conservation's notice of intent to amend LAC 43:XIX, Subparts 1 and 15. We submitted comments on the Department's draft proposed regulatory amendment to LAC 43:XIX. Subpart.I. Chapter 35 ("Potpourri") published on March 20, 2023. We incorporate those comments here.

EDF is a membership organization with more than 3 million members and activists worldwide and in the state of Louisiana, many of whom are deeply concerned about waste and pollution from oil and natural gas development and operations. EDF brings a strong commitment to sound science, collaboration, and market-based solutions to our most pressing environmental and public health challenges.

I. Introduction

EDF supports the amendments to LAC 43:XIX, Subparts 1 and 15 as they represent a considerable improvement over the status quo and will lead to a reduction in wasted natural gas and methane emissions from Louisiana's production facilities. In 2019, Louisiana oil and gas producers wasted approximately 5.2 billion cubic feet of methane through venting and flaring alone—that is \$16 million of natural gas. That is enough wasted gas to supply all the households

in Baton Rouge for over a year and a half. Per our analysis, the proposed prohibition on routine flaring will apply to approximately 94% of the natural gas produced from oil wells in the state¹ and will prevent the release to the atmosphere of between 218,000 and 364,000 metric tons of CO₂e annually (100-year and 20-year GWPs, respectively).² The extension of the prohibition on venting to horizontal wells applies to 4,553 horizontal wells, excluding stripper wells, that are currently not regulated.³ Horizontally drilled wells comprise the vast majority of new wells being permitted in the state, and thus the removal of the horizontal well exemption will extend critical protections to the majority of new wells going forward.⁴ These, as well as other proposed improvements discussed below, represent a significant improvement over the status quo and will reduce waste associated with venting and flaring.

While the rule stops short of implementing a complete ban on routine flaring from all oil wells in Louisiana—something other states have done and an outcome EDF believes is lawful and feasible for Louisiana—there is much to like in the current proposal. We particularly support the following provisions, all of which are new:

¹ EDF analysis based on 2019 data. Oil well here refers to any well that produces some amount of hydrocarbon liquids. Per our analysis oil wells produced gas 404,340,000 MCF of natural gas in 2019. The proposed prohibition on flaring applies to 2,960 oil wells responsible for 379,400,000 MCF of produced natural gas.

² EDF used reported 2019 flaring data for the Haynesville play in TX (available at the well level in Enverus Prism) in order to estimate the proportion of flaring at wells of various trajectories and production levels (i.e., stripper, GOR, vertical, horizontal). After comparing production profiles between TX and LA, EDF determined the Haynesville to be the closest comparative producing region to LA as a whole. EDF used the Haynesville play as a proxy for well-level flaring data in LA to estimate that 71% of flaring occurs at wells under the proposed ban on routine flaring. An additional 11% of flaring is estimated to occur at vertical wells with a GOR<2000/1, and another 18% is estimated to occur at wells that would fall under a ban on routine flaring aside from their stripper status. EDF used these categorical proportions to disaggregate the reported 5.056 bcf (EIA, LDNR) of flared gas in LA in 2019 by well type, and estimated CO₂ emissions from flaring using a 95% flare efficiency.

³ EDF analysis based on 2019 production and trajectory data obtained from Enverus.

⁴ EDF review of Enverus data regarding the type of wells permitted and spud over the last decade. There has been a steady increase in the percent of horizontal or directional wells permitted, with horizontal or directional wells comprising over half of the permitted wells since 2017. Similarly, horizontal or directional wells comprised between 60% of the wells spud in 2016. This percentage increased to more than 80% of the wells spud in 2023. See Figure 1, below.

- A requirement that with their application for a permit to drill, oil and gas operators certify that they will either route 100% of their produced gas to sales or, if not, represent how they will manage their gas. As discussed further below, in a situation where an operator cannot certify that 100% of their produced gas will be routed to sales, we support the proposal's options to either shut-in or submit a gas capture plan that ensures the gas is beneficially used, but not the option that allows an operator to "evaluate if [the] well is [a] candidate for flaring based on economic hardship."⁵
- The new prohibition on routine flaring.
- The removal of the horizontal well exemption from the current prohibition on venting.
- The narrowing of the availability of the economic hardship exemption and the addition of new informational requirements to justify the exemption.
- New monthly reporting requirements for venting and flaring.

II. Comments on Key Substantive Provisions

A. Subpart 1, Ch. 1, Section 103: Gas capture plans.

Overall, EDF supports the newly proposed Section 103 to Chapter 1 of Part XIX. This section adds a new requirement to operators applying for a permit to drill. Per the newly proposed Section 103, at the time of application to drill all operators must certify either that they "will be able to connect the well to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the volume of natural gas the operator

⁵ LAC 43:XIX. § A.3.

anticipates the well will produce"⁶ or that they will not be able to make such a connection.⁷

Operators that cannot make this certification must either shut-in the well until the operator can make such a certification, "evaluate if the well is a candidate for flaring based on economic hardship" or "provide a gas capture plan that evaluates and selects one or more beneficial uses until a gas gathering system is available."⁸ Beneficial uses cannot result in venting or flaring.⁹

There is no reason an operator should ever routinely flare during normal oil production from a new well. As set forth in our prior comments, prudent operators can plan where and when to drill, complete, and begin production at new wells. Such planning, which may involve coordination with midstream and/or other upstream operators, can ensure that an operator can connect new wells to a "gathering system...with sufficient capacity to transport one hundred percent of the volume of natural gas the operator anticipates the well will produce..." as required by proposed Section 103.A.3. The draft rule acknowledges this reality by including a certification of adequate takeaway capacity provision.¹⁰ We agree that operators who cannot make this certification must either shut in the well or employ an alternative method to capture and put to beneficial use, rather than vent or flare, associated natural gas.¹¹ As our prior comments demonstrated, a suite of economic and technically feasible alternatives exist to venting or flaring. Shutting in a well is one such option, and an option that in the opinion of Tom Alexander, a former Vice President of Southwestern Energy, will not harm the reservoir.¹² As the draft rule acknowledges, other options include using the produced gas for field use or

⁶ LAC 43:XIX. §103.A.3.a.

⁷ LAC 43:XIX. §103.A.3.b.

⁸ Id. at §103.A.3.b.

⁹ Id. at §103.A.3.b.iii.(a)-(d). None of the enumerated beneficial uses in iii.(a)-(c) should result in venting or flaring and the catch-all provision in (d) prohibits venting or flaring from "other alternative beneficial uses."

¹⁰ Id. at § 103.A.3.a.

¹¹ Id. at § 103.A.3.b.i., iii.

¹² Export Report of Thomas Michael Alexander, Alexander Engineering at 3 (hereinafter "Alexander Report"), submitted with EDF comments on Potpourri.

power generation for alternative uses.¹³ As our prior comments discussed, these and other alternative beneficial uses are cost effective and feasible—especially for new wells where operators are in complete control of where and when to drill and bring new wells online.

The rule allows for the possibility that an operator will not have adequate takeaway capacity for a limited period of time and allows an operator to employ alternative means to utilize associated gas provided such means do not result in venting or flaring. Specifically, operators who cannot certify that they will connect to a gathering system with adequate takeaway capacity may provide “a gas capture plan that evaluates or selects one of more beneficial uses *until a natural gas gathering system is available...*” (emphasis added).¹⁴ We agree that operators can and should be able to connect to a gathering system prior to production and thus that reliance on abatement options other than sending associated gas to sales are applicable only in limited instances when adequate takeaway capacity is temporarily unavailable. Situations that could give rise to a short-term unavailability of an otherwise available gathering system could include temporary downtime of the gathering line due to maintenance or temporary line capacity constraints.¹⁵

We do not believe the provision in proposed Section 103 A.3.b.ii., allowing an operator to “evaluate if well is candidate for flaring based on economic hardship per Section 3507.B...”¹⁶ is necessary nor consistent with the Department’s mandate to minimize waste. La. Stat. tit. 30 Section 3(16)(b) defines waste as including “producing of an oil or gas well in a manner causing, or tending to cause, *unnecessary* or excessive surface loss or destruction of oil or gas.” (emphasis added). For the reasons set forth above and in our prior comments, routine flaring is

¹³ LAC 43:XIX § A.3.b.i.iii.

¹⁴ Id. at § A.3.b.ii.

¹⁵ Alexander Report at 4; EDF Comments on Potpourri at 13-14.

¹⁶ LAC 43:XIX § A.3.b.i.ii.

never justified from a new well.¹⁷ Operators can and should properly plan and coordinate, as necessary, with midstream operators, to ensure adequate takeaway capacity at the onset of production. Such planning is wholly within the control of operators. In those rare situations when an otherwise available gathering line becomes temporarily unavailable, the draft rule allows an operator to provide a gas capture plan to the Department that evaluates or selects the use of one or more beneficial uses for the gas. This alternative provides upstream operators with a pathway to begin production absent the availability of a gas gathering line on a temporary basis. Such operators can use the associated gas onsite, convert the gas to compressed natural gas, inject or reinject the gas, use it for electrical generation, or another beneficial use that does not result in venting or flaring. At least one of these options will be economically feasible for operators of new wells since new wells are at their peak of production, and thus revenue potential is maximized. As discussed in our prior comments, “CNG trucking is a “portable, scalable and low or negative cost” approach to gas capture.¹⁸ CNG trucking is particularly economical where operators can pool gas production from multiple well pads.¹⁹ For particularly high producing wells CNG trucking will constitute a net benefit for operators.²⁰ Utilizing gas for onsite use can also result in net savings to operators. Analysis prepared by Rystad Energy estimates that, on average, on-site use of gas nets a profit of \$8.60/mcf.²¹ Additionally, operators can shut in the well until adequate takeaway capacity is regained. The expert report of Tom Alexander notes that not only is shutting in wells not harmful to production but in some instances it can enhance the performance of the well.²² We anticipate the Department granting very few

¹⁷ EDF Comments on Potpourri at 13-14.

¹⁸ EDF Comments on Potpourri at 16.

¹⁹ Id.

²⁰ Id.

²¹ Id. at 18.

²² Alexander Report at 4.

exceptions pursuant to this provision in light of the availability of economic and feasible options for capturing and either selling, injecting or beneficially using produced natural gas.

We respectfully request the Department review the need for Section 103 A.3.b.ii in the future based on the number of economic hardship requests the Department receives and grants. This review could be part of a larger review of Chapters 1 and 35 of Part XIX, as we discuss below.

We recommend a clarifying change to proposed Section 103 A.3.b.iii. This provision allows an operator who cannot certify connection to a gathering system to submit a gas capture plan “that evaluates or selects” one or more beneficial uses. We believe the intent of the gas capture plan requirement is to ensure that operators who cannot certify adequate takeaway capacity have an alternative plan to capture and put to beneficial use produced associated gas. As such, we suggest replacing the “or” in “evaluates or selects” with “and.” Thus, operators submitting a gas capture plan would be required to “evaluate *and* select” a beneficial use for the produced associated gas that does not result in waste.

B. Subpart 15, Ch. 35. Prohibition on Venting

Current Conservation rules prohibit “venting of natural gas from any well producing in the state” unless the district manager grants an economic hardship exception. In addition, operators may vent due to “unavoidable situations.”²³ Operators of horizontal wells and wells in recognized stripper well areas (“stripper wells”) are exempt.²⁴

The proposed amendments to Section 3507 and Section 3509 alter the current framework applicable to venting from oil and gas wells. First, the proposed amendments remove the economic hardship exception and the horizontal well exemption. The amendments only allow

²³ LAC 43:XIX § 3511.

²⁴ Id. at § 3509.

for venting where “permissible flaring” is neither economical nor safe. Unlike the Potpourri, the amendments do not apply to preproduction activities.

We support the proposed expansion of the prohibition on venting to horizontal wells. As our prior comments set forth, venting is a particularly pernicious practice that emits methane—a powerful climate-forcer responsible for at least 25% of current warming today.²⁵ Leading states such as Colorado and New Mexico, as well as EPA, prohibit venting other than where necessary for safety or during temporally limited and specifically enumerated instances.²⁶

We reiterate our support for a limited exception for venting where necessary for safety. We do not support the exception for venting where permissible flaring is not economical. Leading states do not have a similar exception and EPA has proposed to prohibit all venting other than where necessary for safety.²⁷ New Mexico prohibits venting other than “when flaring is technically infeasible or would pose a risk to safe operations or personnel safety, and venting is a safer alternative to flaring.”²⁸ Colorado similarly only allows for venting during production during certain temporally limited exceptions such as during maintenance activities, bradenhead monitoring, and upset conditions.²⁹ As New Mexico recognizes there may be technical reasons that can prevent an operator from flaring, such as low-pressure or low volume gas that is insufficient to power a flare or combustor continuously without the assistance of supplemental fuel.³⁰ We are not aware of any similar constraints that would justify venting rather than flaring based on economic considerations—particularly in light of the exemption for stripper wells. Indeed, the expert report of Tom Alexander submitted with our prior comments notes only three

²⁵ IEA, Methane and Climate Change, <https://www.iea.org/reports/global-methane-tracker-2022/methane-and-climate-change>.

²⁶ 87 Fed. Reg. 74,702 (Dec. 6, 2022); 2 Colo. Code Regs. § 404-1-903.d; N.M. Code R. § 19.15.27.8.

²⁷ 87 Fed. Reg. 74,702 (Dec. 6, 2022).

²⁸ N.M.A.C. § 19.15.27.8.A.

²⁹ 2 Colo. Code Regs. § 404-1-903.d.1.

³⁰ N.M.A.C. § 19.15.27.8.D.(4).

instances where venting is ever necessary: during upset conditions, during bradenhead monitoring, and during packer leakage testing.³¹ Accordingly, in the future, we respectfully request the Department review, and consider revising through a new rulemaking action, Section 3507.A. in so far as it allows operators to vent where “permissible flaring” is not economical. We further request the Department clarify what is meant by “economical” in Section 3507.A. since this term is not defined and it is not clear if “economical” means something other than demonstrating an “economic hardship” as defined in Section 3507.B.

Consistent with our comments on the Potpourri, we also request the Department re-examine the exemption for preproduction activities in the future. While EPA regulates completions, leading states such as New Mexico and Colorado have adopted even more protective requirements for completions. Such states also regulate drilling. As part of a future review of its rules, we urge the Department to review, and consider removing through a new rulemaking action, the exemption for “drilling, completion, and hydraulic fracturing operations” in proposed Section 3509.A.3., and in so doing, consider adopting rules consistent with those contained in the Potpourri for these activities.

C. Subpart 15, Ch.35. Prohibition and Definition of Routine Flaring.

We support the amendments to Subpart 15, Ch. 35 that propose to eliminate routine flaring at wells with a gas/oil ratio > 2000/1 and horizontal wells with a gas/oil ratio < 2001/1. Current Louisiana rules do not contain any prohibition on routine flaring. Adding a restriction on routine flaring is an important step towards reducing “unnecessary or excessive destruction of gas,” as required by La. Stat. tit. 30 Section 2 and 3(16)(b). As our prior comments demonstrated, routine flaring is never justified as there are myriad options available to operators

³¹ Alexander Report at 6.

to capture and either use, sell, store, or reinject associated gas. Routine flaring is thus both “unnecessary” and “excessive.” The actions of other leading states who have banned routine flaring, including Colorado, New Mexico and Alaska, and policies of numerous leading producers, are in accord.³² The draft rule therefore closes an important gap with respect to routine flaring. Per our analysis, the proposed prohibitions on routine flaring from covered wells applies to approximately 94% of the natural gas produced from oil wells in 2019, accounting for the exemption for stripper wells in Section 3509.A.2. Moreover, horizontally drilled wells account for the majority of applications to drill new wells in the state. The prohibition against routine flaring from horizontal wells, combined with the new certification and gas capture requirements in Section 103 will ensure that future wells do not unnecessarily contribute climate-altering, harmful and wasteful emissions to the atmosphere. EDF estimates that prohibiting routine flaring at covered wells (i.e., non-stripper horizontal wells, as well as non-stripper vertical wells with a GOR>2000/1) will prevent between 218,000 and 364,000 metric tons of CO₂e annually (100-year and 20-year GWPs, respectively).³³ Prohibiting routine flaring from these wells would prevent the waste of natural gas valued at \$10,840,000³⁴ annually and is equivalent to preventing the emissions from more than 975,000 passenger vehicles being driven for a year.

While we support the proposed prohibitions on routine flaring, we recommend the Department revisit the GOR thresholds in the future. As we noted in our prior comments, the Governor’s Climate Action Plan recommended the Department “enact methane waste rules in

³² EDF Comments on Potpourri, 10-11.

³³ EDF analysis, *supra* note 2.

³⁴ Value calculated using Henry Hub price for 2019, which is \$2.90 per MMBtu (2022 dollars).

line with rules of other states.”³⁵ While a significant improvement over current regulations, the draft rules fall short when compared to leading rules adopted by Colorado and New Mexico. These states have successfully implemented a wholesale ban on routine flaring from all wells, regardless of the amount of gas produced, or the ratio of gas to oil. According to the EIA, Colorado is the fifth largest oil producer in the U.S. and New Mexico is the second largest producer of oil.³⁶ If operators in New Mexico and Colorado can capture and put their natural gas to beneficial use than so can Louisiana operators, especially those operators of non-stripper wells who nevertheless produce associated gas and are exempt from the proposed prohibition on routine flaring due to the proposed GOR thresholds. Going forward, the Department will have records on the amount of gas and oil produced by operators subject to the proposed ban on routine flaring and venting. We respectfully request the Department review, and consider revising through a new rulemaking action, the rule in two years to determine if the GOR thresholds are in line with the statutory mandate to minimize waste by prohibiting the drilling or producing of an oil well in a manner causing, or tending to cause, unnecessary or excessive destruction of gas.³⁷

C. Narrowing of Availability of Economic Hardship Exception

The proposal retains an exception for economic hardship from the current rule, yet moves this exception from Section 3507.A (prohibition on venting) to Section 3507.B. (prohibition on routine flaring). Additionally, the proposal limits the availability of this exception in two ways. First, in Section 3507.B. the proposal limits the applicability of the economic hardship exception to operators who demonstrate “that the current market value, at the point of delivery, of the gas

³⁵ State of Louisiana, Climate Action Plan (Feb. 2022), https://gov.louisiana.gov/assets/docs/CCI-Task-force/CAP/Climate_Action_Plan_FINAL_3.pdf, p.68.

³⁶ US Energy Information Administration, <https://www.eia.gov/state>.

³⁷ LSA-R.S. § 30:3(16)(b).

proposed to be flared exceeds the cost involved in making such gas available to a market, or where revenue from a beneficial use identified in § 103.A.3.b.I-IV exceeds the cost in implementing the same.” The second part of this demonstration, namely the requirement that operators seeking this exception must demonstrate that the revenue from a beneficial use exceeds the cost of implementing a beneficial use, is a new addition to the economic hardship exception demonstration. Second, the amendments propose specific informational requirements operators must submit to the district manager as support for the exception request.

As a general policy matter, we do not support broad exceptions to associated gas capture requirements based on economics. This is particularly true in those instances, such as here, where the capture requirements apply to a limited subset of wells in a state. As set forth in our prior comments, and reflected in rules promulgated by Colorado and New Mexico, operators have available a suite of economically viable options to capture and sell, put to beneficial use, or inject and store, natural gas. Routine flaring, as proposed to be defined by the Department, is unnecessary and wasteful. As set forth above, operators of new wells can plan to ensure adequate takeaway capacity. And, if a gathering system becomes unavailable for reasons outside of the producer’s control, operators can employ methods or technologies to limit any necessary flaring to a temporary method of managing gas and avoid prolonged, routine flaring.³⁸ Such methods include:

- Temporarily shutting in wells until the gathering system becomes available. Per the expert opinion of Thomas Alexander, shutting in wells does not harm well productivity and in some cases, may enhance well performance. Moreover,

³⁸ EDF Comments on Potpourri, 14-19.

temporary shut ins do not destroy, but rather merely delay, royalty payments since shut ins do not permanently end production.³⁹

- Converting the associated gas to compressed natural gas (CNG) and trucking the CNG to gas processing plants.
- Utilizing associated gas for onsite use.

While we do not believe the economic hardship exception is necessary or appropriate, we support the Department's amendments to the exception that require operators to evaluate other options for utilizing associated gas than simply sending it to a sales line.

We also appreciate the additional information requirements the Department proposes to include in an operator's demonstration of economic hardship. Current rules do not specify what, if any, information an operator seeking an economic hardship exception from the current prohibition on venting must provide. The current proposal requires operators seeking the exception to provide the following information to substantiate the request: relevant well information; a statement of need; economic justification; evaluation of alternative beneficial use per § 103.A.3.b.I-IV; rate; and length of time. While we suggest some minor clarifications to these informational requirements below, we support the addition of clear, specific information upon which the district manager can assess the legitimacy of an exception request. Clear criteria are also helpful to the public who have an interest in understanding the factors the district managers will weigh when considering when determining whether to approve of an exception request.

We suggest a few minor clarifying revisions to the information requirements proposed in 3507.B. and 3507.B.1-5. First, as discussed above the Department Proposes to require operators

³⁹ New Mexico Methane Advisory Panel Report (2019), at 159, available at <https://www.env.nm.gov/wp-content/uploads/sites/15/2019/08/MAP-Technical-Report-December-19-2019-FINAL.pdf>.

demonstrate that “revenue from a beneficial use identified in § 103.A.3.b.I-IV exceeds the cost in implementing the same.” We suggest revising this sentence to state “revenue *or economic benefit* from a beneficial use identified in § 103.A.3.b.I-IV exceeds the cost in implementing the same.” Certain beneficial uses, such as use of associated gas to replace purchased fuel for onsite use, power generation for alternative use, and injection for storage and future use, may not result in increased revenue for the operator from the beneficial use but may deliver an economic benefit to the operator.

Second, we believe the citation to Section 103 in proposed B.3. is incorrect. We believe the proper citation is to § 103.A.3.b.iii.(a)-(d) as this is the provision that lists allowable beneficial uses of gas in the absence of a connection to a gathering system. The draft rule cites to § 103.A.3.b.I-IV, which does not exist.

Third, we suggest clarifications to 3507.B.4 and 5. As proposed, the informational requirement in B.4. applies to “rate.” We assume this refers to rate of production of oil and gas for the well(s) for which an operator seeks an exception, however we suggest clarifying the language to be more explicit.

Fourth, the informational requirement in B.5. applies to “length of time.” It is unclear if this is meant to refer to the length of time for which an operator seeks an exception or the length of time that the well for which the exception is requested has been producing. Clarifying language would be helpful to provide clear instructions for operators and transparency regarding the intent of the informational requirements for the public. We suggest that exceptions be granted for limited periods of time—two years or less—as the availability and costs of capture methods and technologies can change considerably over time.

E. Sections 3507 and 3509. Regulation of Horizontally Drilled Wells

We support the proposed removal of the exemption in current Section 3509 for horizontal wells. The current rules, which only apply to venting, do not apply to horizontally drilled wells. In 2019, there were 4,553 horizontal wells, excluding stripper wells, in the state, responsible for the production of 2,841 bcf of natural gas. Excluding gas-only horizontal wells, gas production from horizontal non-stripper oil wells accounts for 80% of all associated gas production and 9% of total gas production. Operators of these wells are not required to conserve, let alone combust or flare, this natural gas. Unfortunately, data on the amount of gas that such wells currently waste—either through venting or flaring—is not available as the Department does not require operators to report vented or flared volumes on the well level. Thus, we do not have reliable ways to estimate the waste, or methane or other pollutant emissions, from currently exempt horizontal wells. Nevertheless, given the number of such wells in the state, and the amount of gas produced by such wells, we view the removal of the exemption for horizontal wells as an important protection offered by the amendments.

In addition, in recent years there has been a steady uptick in applications for permits to drill, and spudding of, horizontal wells.⁴⁰

Figure 1. Spuds and Permits by Well Type⁴¹

Spud Year	Vertical	Horizontal/Directional
2023	13%	80%
2022	19%	77%
2021	16%	78%
2020	19%	77%
2019	28%	64%
2018	32%	61%
2017	27%	66%
2016	35%	60%

⁴⁰ EDF analysis based on information obtained in Enverus.

⁴¹ Information for calendar year 2023 is incomplete.

Permit Approved Year	VERTICAL	HORIZONTAL/DIRECTIONAL	Total
2023	28%	71%	344
2022	24%	75%	855
2021	25%	74%	609
2020	24%	75%	494
2019	38%	61%	725
2018	37%	62%	876
2017	37%	62%	909

The extension of the prohibition on venting in current Section 3507 to horizontally drilled wells combined with the prohibition on flaring in proposed Section 3507.B and takeaway capacity certification requirement in proposed Section 103 will help ensure that gas is conserved by the majority of newly drilled wells in the state going forward. This is also a critical improvement over the status quo.

F. Section 3511. Exemption for "Unavoidable Situations."

Current rules allow venting due to "unavoidable situations." This term is not defined in current rules nor in the proposed amendments. The proposed amendments extend this exemption to flaring.⁴²

We urge the Department to clarify the meaning of "unavoidable situations" by defining this term. Neither current rules nor proposed amendments define this term. Webster's dictionary defines unavoidable as "impossible to avoid or evade." Thus, circumstances that are outside the reasonable control of an upstream operator, such as temporary loss of a gathering system due to unforeseeable downstream maintenance or equipment failures, constitute "unavoidable situations." The draft rule contained in the Potpourri contained an exception for "upset conditions" defined as "a sudden unavoidable failure, breakdown, event, or malfunction, beyond

⁴² Proposed Section 3511.A.

the reasonable control of the Operator, of any equipment or process that results in abnormal operations and requires correction but does not include an event arising from or related to an operator's negligence, failure to install appropriate equipment, or failure to perform scheduled maintenance." We believe this addresses the same types of circumstances as the Department's "unavoidable situations" exception yet provides significantly greater clarity as to what types of events are covered by the exception. We recommend the Department clarify Section 3511.A. by defining "unavoidable situations" as "a sudden unavoidable failure, breakdown, event, or malfunction, beyond the reasonable control of the Operator, of any equipment or process that results in abnormal operations and requires correction but does not include an event arising from or related to an operator's negligence, failure to install appropriate equipment, or failure to perform scheduled maintenance."

Current Department rules do not require operators report the amount of vented gas lost during "unavoidable situations." We recommend the Department clarify that Section 3507.E., requiring "permissible venting or flaring" include venting or flaring resulting from "unavoidable situations." Operators that vent due to "unavoidable situations" are not out of compliance with the prohibition on venting in Section 3507.A. since Section 3511 permits venting during "unavoidable situations." Thus, venting during an "unavoidable situation" is "permissible venting." Tracking the amount of venting that occurs during "unavoidable situations" will help the Department and the public track the amount of waste occurring in Louisiana due to this exception while also ensuring that operators are not impermissibly venting or flaring due to events that are well within their control, and thus clearly avoidable.

G. Reporting requirements

We support and appreciate the Department's proposed requirement that operators report "permissible venting or flaring."⁴³ We suggest the Department clarify what constitutes "permissible venting or flaring" since this term is not defined and the term is not clear on its face. For example, since the rules do not prohibit venting or flaring at certain wells, e.g., stripper wells, is venting or flaring at such wells "permissible."? Or, does the reporting requirement only apply to venting or flaring that occurs due to one of the exceptions contained in Section 3507 (e.g., venting due to safety or routine flaring due to economic hardship)?

We encourage the Department to require operators report all flared and vented volumes, regardless of whether such activities occur at exempt wells, during exempt activities such as preproduction activities, or subject to exceptions, such as "unavoidable situations." Doing so will ensure the state, and the public, knows how much waste is actually occurring from oil and gas wells in the state. Such information is important in order to ensure the Department is carrying out its mandate to minimize waste and important to ensuring compliance with the rules. Such information can also help inform future rule revisions, whether required to ensure consistency with federal requirements such as the upcoming EPA emission guidelines for existing oil and gas sources, or to ensure consistency with Louisiana law and policy priorities.

III. Conclusion

We greatly appreciate the Department's consideration of our comments on much needed amendments to LAC 43:XIX, Subparts 1 and 15. We look forward to the Department's expeditious promulgation and implementation of the amendments which will prohibit routine flaring at sites responsible for an estimated 71% of flaring, reducing emissions by approximately

⁴³ Proposed Section 3507.E.

364,000 metric tons of CO₂e annually, equivalent to preventing the emissions from more than 975,000 passenger vehicles being driven for a year.⁴⁴

Respectfully submitted,

Elizabeth Lieberknecht
Regulatory and Legislative Manager, Midcontinent
Environmental Defense Fund

Elizabeth Paranhos
deLone Law, Inc

Liz Russell
State Director, Louisiana
Environmental Defense Fund

⁴⁴ EDF analysis assuming a 20-year GWP.



8/21/2023

By Email

To: Office of Conservation
Engineering Administrative Division
Attn: Carrie Wiebelt
P.O. Box 94275
Baton Rouge, LA 70804-9285

RE: Attention: Venting and Flaring of Natural Gas

Dear Ms. Wiebelt,

Louisiana Mid-Continent Oil and Gas Association (LMOGA) is a state trade association representing all oil and natural gas industry sectors in Louisiana and the Gulf of Mexico. Our members provide safe, affordable, reliable energy products that make modern life possible and meet the demands of a global economy. LMOGA appreciates the Louisiana Department of Natural Resources (LDNR) engaging stakeholders in formal rulemaking to foster a collaborative environment that encourages constructive dialogue.

LMOGA is interested in the Department of Natural Resources, Office of Conservation notice of intent to amend LAC 43:XIX and Subpart 1. (Statewide Order No. 29-B) Chapter 1 (General Provisions) and Subpart 15 (Statewide Order No. 45-I-A) Chapter 35 (Gas/Oil Ratios, Allowables and Venting of Natural Gas) to prohibit venting and flaring of natural gas except as authorized in Subpart 15 because its member companies are subject this environmental regulation. LMOGA requests that the following comments be included in the administrative record for this rulemaking:

Comments

- **Comment 1 – Expansion of Section §3507. A.**





Proposed subsection §3507.A provides, "The venting natural gas from any well operating in Louisiana is strictly prohibited, except in cases where the permitted flaring detailed in §3507.B is neither economical nor safe." LMOGA comments that the scope of §3507.A seems limited and should be broadened to encompass routine flaring and the scenarios provided as exceptions in §3509. Accordingly, LMOGA suggests revising §3507.A to state: "The venting of natural gas from any well producing in the state of Louisiana is hereby expressly prohibited except in those instances where flaring as specified in §3507.B is not an economical or safe alternative or those instances which are included as exceptions under §3509."

- **Comment 2 – Clarification of Section §3507.D.**

Proposed subsection §3507.D provides, "Any permissible flares 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." LMOGA is concerned that using undefined terms will create confusion. There are no "permissible" flaring instances in the rule – it prohibits all such actions unless exempted. LMOGA suggests amending subsection §3507.D to State: "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."

- **Comment 3 – Clarification of Section §3507.E.**

Proposed subsection §3507.A provides, "Any permissible venting or flaring shall be reported, including measured or estimated volumes of each, on the monthly OGP and R5D. LMOGA is concerned that using undefined terms will create confusion. There are no "permissible" flaring instances in the rule – it prohibits all such actions unless exempted. LMOGA suggests amending subsection §3507.E to State: 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."





- **Comment 4 – Expansion of Section §3509.A.3**

Proposed subsection §3509.A.3 provides, "These rules and regulations shall govern the production of oil and gas or both in Louisiana, except venting or flaring during drilling, completion, and hydraulic fracturing operations." The scope of §3509.A.3 seems limited and should be broadened to encompass routine flaring and the scenarios provided as exceptions in §3509.A.3. LMOGA suggests amending subsection §3509.A.3 to state: "These rules and regulations shall govern the production of oil and gas or both in the state of Louisiana, except venting or flaring during drilling, completion, and hydraulic fracturing operations, during maintenance activities such as liquid unloading, during workover or intervention operations, delineation or wildcat wells, sour oil wells with associated gas far down the decline curve, and declined oil wells with associated gas where uneconomic to install a gas line."

- **Section 3511.A (Violations), we request the following changes:**

Proposed subsection §3509.A.3 provides, "However any venting or flaring which contradicts the spirit or intent of this Statewide Order shall be a [v]iolation [...]." LMOGA comments that this wording is overly vague and could be interpreted too broadly. LMOGA suggests amending subsection §3509.A.3 as follows: "However any venting or flaring which contradicts the spirit or intent of this Statewide Order shall be a [v]iolation [...]."

Conclusion

LMOGA firmly believes that energy production and environmental preservation can coexist harmoniously. Louisiana holds significant potential to contribute to reducing greenhouse gas emissions while continuing to produce lower-carbon energy for years to come. Our industry provides affordable, reliable, and cleaner energy solutions that simultaneously bolster Louisiana's economy. LMOGA's members are committed to developing solutions to address the climate challenge, and we look forward to collaborating with the State toward achieving its climate-related goals. LMOGA appreciates the opportunity to provide these comments and looks forward to the





Agency's completion of the rulemaking process. Should the Louisiana Department of Natural Resources require additional supporting information relative to these comments or have any questions concerning this submittal, don't hesitate to contact Damien Watt at 225-387-3205 or by email at Damien.Watt@lmoga.com.

Sincerely,

A handwritten signature in black ink that reads "Tommy Faucheux". The signature is written in a cursive, flowing style.

Tommy Faucheux
President, Louisiana Mid-Continent Oil and Gas Association



August 21, 2023

Carrie Wiebelt
Jonathan Rice
Louisiana Office of Conservation
617 North Third Street, 9th Floor
Baton Rouge, LA 70802

RE: Comments to NOI on Venting & Flaring

Carrie & Jonathan,

As per our recent conversation regarding the Notice of Intent of the state's implementation of the Environmental Defense Fund's (EDF) recommendations on Venting and Flaring (V&F), below are LOGA's comments. While it seems many of our concerns introduced by the Potpourri back in April have been considered and agreed to by Conservation, the following concerns remain from various members. Most comments are concerning broadness, ambiguity, and definition. We would appreciate your consideration of these important bullet points.

- In some instances, for maintenance work, equipment will have to be blown down and isolated. So, if spelling out venting as a result of maintenance activities for producing wells is exempt, that would remove any ambiguity.
- It would be beneficial to see venting for liquids unloading specifically excluded from this rule (perhaps in 3501). The interpretation of the order, as described in 3511, is that its intention is to minimize waste. That is a rather subjective topic. Having that specific exclusion would close that gap on a common practice to keep wells producing when they have fallen below critical velocity, have had corrosion batch treatments, etc.
- The new proposal addresses wells with GORs in excess of 2,000:1. It doesn't seem clear that wells with GORs of less than 2,000:1 will still be allowed to flare without a lot of additional burden and time to prove things beyond today's requirements. If we're adapting to a new mindset that makes it difficult to flare, it should be made clear that there is *NO* change in how wells with GORs of less than 2000 are handled.
- The applicability is too broad in scope. As proposed, it is possible to interpret gas vented during maintenance activities would be subject to the proposed requirements of no venting, request to flare, and reporting. Liquid unloading is another example. Swabbing operations are used to vent gas to tanks in order to try to lift water off of the gas wells. This is a very common practice that pumpers in the field do when necessary, it's not something that is or can be scheduled.

- A pipeline issue could shut operators in as water builds up and there is not enough gas to buck line pressure to get to sales. Water has to be blown off of the top and then the wells will produce normally. When this is done, there is gas that is sent to the water tank and vented. Again, this is not something that can be scheduled but happens.
- Avoiding unnecessary flaring as well as bottlenecks in the approval processes would be beneficial to limiting the scope. We suggest the applicability be limited to primary gas, along with a definition of primary gas.
- If there are specific activities associated with primary gas production that are allowed to be vented or flared, these should be outlined in the rule text, i.e. wildcat wells, delineation wells, stripper wells, and declined oil wells where it's uneconomic to install a gas line.
- *A.3 iii. IV. Other alternative beneficial use that does not result in venting or flaring* could be very problematic. Not only is this a condition to obtaining a drilling permit, it is also a continuing requirement for a producing well pursuant to 3507. B. Because *other alternative beneficial use* is not defined, it could force an operator to make capital investments in activities completely unrelated to oil and gas. This type of ambiguous language allows environmental groups to sue regulators for lack of enforcement. The first thing that came to mind as another beneficial use was bitcoin mining... no thanks. LOGA suggests that A.3 iii. IV be struck or deleted altogether.
- With regards to stripper wells we propose the following suggestions that would help clarify the current form of the NOI. We propose adding language to the "Application to Drill." Language could be added to A.4, that stripper wells are exempt from A.3. The operator can state the well is expected to be a stripper well on the form, then the permit can be granted. We also propose that "Exceptions and Hearing" should be changed to "Exceptions, Exemptions, and Hearing." Lastly, item A.2 could be changed to read "recognized stripper areas and stripper wells certified by the Louisiana Department of Revenue are exempt."

LOGA recognizes the concerns attempting to be addressed in the proposed regulation and hopes that the final rule will be one that operators can comply with and regulators can enforce. We thank all of you at Conservation for understanding the strife and hardships that some of this would cause to Louisiana's oil and gas industry and hope you will consider our recommendations.

Sincerely,



Mike Moncla
President, Louisiana Oil & Gas Association



August 18, 2023

Ms. Carrie Wiebelt
Office of Conservation
Engineering Administrative Division
P. O. Box 94275
Baton Rouge, LA 70804-9275

Re: Public Comments
Venting and Flaring of Natural Gas

Dear Ms. Wiebelt:

I am submitting this public comment in response to the Notice of Intent on "Venting and Flaring of Natural Gas". I sincerely appreciate your efforts on providing specific information related to the subject issue. My company, Ryca Energy Partners LLC, is the owner and operator of stripper oil wells located in Concordia, LaSalle, and Winn Parishes, LA. We produce approximately 300 barrels of oil per day and employ 24 people.

Comment #1: We propose to add language to "Application to Drill" that would be specific to stripper wells. Language could be added as A.4 that stripper wells are exempt from A.3. The operator can state on the application that the well is expected to be a stripper well. The permit can then be granted.

Comment #2: We propose that "Exceptions and Hearing" should be changed to read "Exceptions, Exemptions, and Hearings". Item A.2 could be changed to read "recognized stripper areas and stripper wells certified by the Louisiana Department of Revenue are exempt".

Thank you for considering my comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Larry L. Bates", is written over a blue line.

Larry L. Bates
Founder / President / CEO
Ryca Energy Partners LLC

Carrie Wiebelt

From: Herb Sayas <hlabws@grassrootsmessage.com>
Sent: Wednesday, August 16, 2023 7:31 AM
To: Carrie Wiebelt
Subject: Please end routine venting and flaring at oil and gas operations in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Engineering Director, Louisiana Office of Conserva Carrie Wiebelt,

As a parent concerned about climate change, I'm writing in support of the proposed standards to end the practice of venting and flaring at oil and gas operations across the state.

Methane pollution from oil and gas operations is accelerating the pace of climate change and harming the health of our families and communities. And in Louisiana, oil and gas operators are making the problem of methane pollution worse—by wasting methane gas at well sites through the unnecessary and polluting practice of routine venting and flaring.

In 2019 alone, oil and gas operations in Louisiana wasted nearly \$16 million worth of methane gas just through venting and flaring. That's enough gas to fuel all the households in Baton Rouge for over a year and a half.

Standards to limit this practice are necessary to slash methane waste and ensure a cleaner and healthier Louisiana for our children. Please finalize these standards as quickly as possible.

Sincerely,
Herb Sayas
4618 Laurel St
New Orleans, LA 70115

Carrie Wiebelt

From: Isaac Brown <isaac@38northsolutions.com>
Sent: Thursday, August 17, 2023 6:36 AM
To: Carrie Wiebelt
Subject: Comment from the Center for Methane Emissions Solutions for Venting and Flaring Rule
Attachments: Louisiana Venting and Flaring Rule_CMES comment.docx

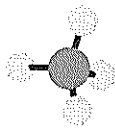
EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

On behalf of the Center for Methane Emissions Solutions, the business group representing the methane mitigation industry in the United States, I would like to submit the attached comment for the public record. Please let me know if you have any questions.

Sincerely,

Isaac Brown
Executive Director
Center for Methane Emissions Solutions



CMES

CENTER FOR METHANE EMISSIONS SOLUTIONS

FILED IN PERSON

August 18, 2023

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 Louisiana Department of Natural Resources (“LDNR”) need not make a difficult choice between protecting public health and supporting the economy. It is our view, that the rule under consideration takes important steps toward reaching this balance, and that is why our organization writes in support.

Specifically, we would like to endorse provisions within this rule that:

- ⇒ **Prohibits Routine Flaring at wells** with gas to oil ratios above 2000 standard cubic feet to one barrel of oil and at all horizontal wells. Today, there a wide range of technologies that are commercially available, with varying costs, that can help produce eliminate the need for flaring. In fact, it is this proliferation of options that leads us to ask that the LDNR consider expanding the prohibition to all routine flaring, and further consider limits on non-routine flaring as well;
- ⇒ **Revises the Existing Economic Hardship Exception.** The proposal increases the threshold operators must meet to secure the economic hardship exception, including demonstrating that alternative options have been properly vetted and analyzed. While an exception like this may have been prudent at one time, the broad availability of cost-effective alternatives makes the existence of this exception wholly unnecessary. Outside of eliminating the provision altogether, we do feel that the added safeguards are a step in the right direction;
- ⇒ **Eliminates the Exemption for Horizontal Wells.** Similarly, LDNR’s current policy of exempting horizontally drilled wells from existing venting standards is poor public policy, and we support its removal.

CMES and its members stand behind these positions because we have seen first hand, that the development of innovative 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 LDNR 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

Carrie Wiebelt

From: robshepard194@gmail.com
Sent: Saturday, August 19, 2023 12:15 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I support the rule to eliminate routine venting & burning of methane gas to reduce air pollution as well as limiting economic hardship provisions.

Sent from my iPhone

Carrie Wiebelt

From: Bruce G Sharky <bshark2@lsu.edu>
Sent: Saturday, August 19, 2023 12:20 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Louisiana Residents Deserve Healthy Places to live, Work, and Play

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wiebelt,

Good afternoon on the 110 degree heated afternoon. Louisiana Residents Deserve clean air, clean water, and being safe from the known and known dangers caused when the State allow s methane gas to be burned by oil wells through routing venting and flaring. YES maybe requiring the stop of methane gay to be burned may have economic consequences for the oil companies. But waying the impact on their bottom line versus creating healthy places for people to live in work I think you would agree out ways any economic cost to the oil companies. I think citizens would prefer and vote for protecting their health over any economic cost to the oil companies.

I strongly support the requirement to begin immediately of requiting the oil companies to stop the deleterious act of methane gas to be burned by oil wells through routing venting and flaring.

Bruce Sharky
5034 South Chalet Court
Baton Rouge, LA 70808

Louisiana Residents Deserve Healthy Places to live, Work, and Play

Carrie Wiebelt

From: Liz Steilkie <liz.steilkie@gmail.com>
Sent: Saturday, August 19, 2023 12:20 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Venting and flaring if methane is ecologically irresponsible.

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms Wiebolt,

Please accept this email as support for the legislation to curb venting and flaring of methane gas. It is a reprehensible practice that leads to unreversible damage to our planet. Please try to strengthen the loophole of "economic hardship" as very few fossil fuel corporations need money. They make billions and trillions every year. Louisiana is a lovely place being destroyed by these robber baron corporations. Thank you for your efforts.

Sincerely

Elizabeth Steilkie

Carrie Wiebelt

From: Maggie McWilliams <maggie@mcwilliamshealthcare.org>
Sent: Saturday, August 19, 2023 12:20 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: The Rule on Burning off Methane

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I support this rule as there are currently no controls on burning, methane, flares in Louisiana, and there need to be! I am very concerned about the hardship clause, and whether it can be used as a loophole for big business to continue burning off methane flares. The state can benefit from the methane as that can heat or cool people's homes.

I think the rule should be passed, and the hardship clause should be removed.

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Carrie Wiebelt

From: Laura Carman <lcarman504@gmail.com>
Sent: Saturday, August 19, 2023 12:21 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Proposed rule on methane venting

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wienbelt,

As a Louisiana resident, I write in support of the rule to reduce venting and flaring of methane. I am worried greatly about climate change. It is of worry that faces me every day as I see the effects of greenhouse gases on our world, particularly on Louisiana. Methane is a major polluter. This rule would strengthen efforts to fight climate change and decrease air pollution. Nothing could be more important for thos coastal state.

Thank you.

Laura Carman
53 S Wren Street
New Orleans

Carrie Wiebelt

From: Mary Edie Meredith <maryedie@hotmail.com>
Sent: Saturday, August 19, 2023 12:29 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: In support of the new rule to disallow Methane venting

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

LDNR Office of Conservation

Dear Ms. Carrie Wiebelt,

I wish to express my support for the elimination of routine venting and flaring of gases at Louisiana Oil wells. With the heat dome we are experiencing, how can we afford to pollute the air even more with this activity! Even if you don't believe it is contributing to climate change, no one wants to breathe this stuff, and what a waste besides! Let's capture this stuff and use it responsibly.

I'm so grateful that the LDNR is considering this action. If you could do something to define "economic hardship" exception in a way that will avoid making it a loophole for abuse, that would be even better.

Sincerely,

Mary Edie Meredith
maryedie@hotmail.com
3905 Tchoupitoulas St
New Orleans, LA 70115
971-404-7259 cell

Carrie Wiebelt

From: Ben Rundbaken <brundbaken21@gmail.com>
Sent: Saturday, August 19, 2023 12:30 PM
To: Carrie Wiebelt
Subject: Methane Rules

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Carrie Webelt,

I am a New Orleans resident and I would like to express my support for the laws restricting the burning of methane. It is outrageous that Louisiana does not currently have this legislation- methane is an extremely harmful greenhouse gas, as we have known for decades. Louisiana needs to start working for the people rather than the oil and gas interests. Thank you.

Sincerely,

Ben Rundbaken

Carrie Wiebelt

From: David Porter <davidporter52190@gmail.com>
Sent: Saturday, August 19, 2023 12:33 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: LDNR public comment on methane ventilating

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi!

This is David Porter resident of Baton Rouge 70802.

I wanted to voice my comment on stopping the flaring and venting of methane.

In case you haven't been outside in a min, you can see climate change is starting to have big effects on everything.

Please push this forward to help slow down the heat trapping methane and flaring of it.
We need this so we can have healthy lives and slow climate change.

Thank you!
David Porter

Carrie Wiebelt

From: Bart Everson <whatever@barteverson.com>
Sent: Saturday, August 19, 2023 12:35 PM
To: Carrie Wiebelt
Subject: in support of cutting methane emissions in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hey there, Ms. Carrie Wiebelt, LDNR Office of Conservation --

I'm writing to you today as a concerned citizen of this great state. I'm hearing about this new proposed draft rule that would end the practice of routine venting and flaring of methane at oil wells, and I'm all for it! Please consider this my public comment, on the record, and all that good stuff.

Right now, there are virtually no limitations on how much methane can be vented or flared at oil wells. This is a problem because methane is a potent greenhouse gas that contributes to climate change. It's also a waste of a valuable resource.

This new rule would make sure that all methane produced at oil wells is captured and sold. This would reduce greenhouse gas emissions, help the environment, and generate revenue for the state.

I know that some people are worried about this rule because it could lead to job losses in the oil and gas industry. But I think we can find ways to protect jobs while also protecting the environment. For example, we could provide financial assistance to oil and gas companies that transition to cleaner energy sources.

I urge you to adopt this proposed rule as final. It's a common-sense measure that will benefit everyone in Louisiana.

And hey, if you're worried about the "economic hardship" exception, don't be. I'm sure we can work something out. Just give me a call and we'll hash it out over a plate of gumbo.

Thanks for your time,
Bart Everson
4329 Banks St
New Orleans LA 70119
504-913-5413

Carrie Wiebelt

From: Timothy K. Bond <tkb2@cornell.edu>
Sent: Saturday, August 19, 2023 12:36 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Stop venting gas and oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Stop venting gas and oil wells. Capture the gases or shut the wells down. Clean extraction is the only reasonable way. Make sure that all wells get permanently capped and sealed at the end of useful operation at the expense of the fossil fuel companies, not the state.

Tim Bond

Carrie Wiebelt

From: CC Byrne <byrneworks@gmail.com>
Sent: Saturday, August 19, 2023 12:36 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Please make the draft methane rule permanent

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear LDNR,

There are essentially no limitations on routine venting and burning of methane at oil wells, so a significant source of climate damaging gases is going unchecked. Besides climate change, the burning results in immediate pollution. If the state is smart, harnessing this methane has revenue potential to more than offset the cost of an environmentally friendly capture method. The rule might not be perfect, but it is an important step in the right direction, and if anything, it can be strengthened to preclude abuse by every polluter claiming economic hardship. I urge you to make specific measurable criteria to claim an economic hardship exemption. Perhaps in cases of economic hardship, the state can pay for the environmentally friendly capture in exchange for the state owning the captured gas, which it can then sell as fuel to recoup its costs. Such a plan would likely reduce or even eliminate the number of hardship claims. My daughters live in Louisiana and I am very concerned about the environment there and the general lack of oversight of the many petrochemical operations. Thank you in advance for protecting our environment!

Sincerely,

Christopher Byrne

714 N Allen St

State College, PA 16803

Carrie Wiebelt

From: Sarah Carter <sarah3@ipa.net>
Sent: Saturday, August 19, 2023 12:41 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Rule to prevent routine venting and burning of methane

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am very much in favor of this rule as a step in the right direction to help improve our air quality and as such to prevent many health related consequences of toxic air. I am also greatly concerned about the consequences of our warming planet and think we should do everything in our power to prevent further warming.

Thank you for your consideration.

Sarah Carter, MD
2384 St. Thomas Street
New Orleans, LA 70130

Sent from my iPad

Carrie Wiebelt

From: Deborah Shavlik <deborahshavlik@gmail.com>
Sent: Saturday, August 19, 2023 12:42 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Capping oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi!

So glad we have a chance to voice an opinion on this! As our climate crisis barrels down at us at a faster and more severe rate than scientists even predicted, one of the most effective ways to curb emissions is to cap the millions of open oil wells spewing methane into the atmosphere. Methane is more detrimental than CO2 and I personally don't even think "hardship" is acceptable to NOT cap these wells in any cases. As an individual we can ride our bikes and recycle as much as we can, but that is NOTHING compared to the responsibility of fossil fuel companies to help curb the worst effects of climate change.

Thank you
Deborah Shavlik

Carrie Wiebelt

From: Camilla Pugh <camillapugh1@gmail.com>
Sent: Saturday, August 19, 2023 12:44 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please make the draft limiting methane emissions permanent. I am gravely concerned about the future of our planet.
What kind of quality of life will my grandchildren have?

Camilla R. Pugh
707 Bungalow Lane
Baton Rouge, LA 70802

Sent from my iPhone

Carrie Wiebelt

From: Luis Miron <lfmiron@gmail.com>
Sent: Saturday, August 19, 2023 12:56 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Venting and flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

This is in support of regulations mandating *some restrictions* on the venting and flaring of waste methane in La. oil wells.

This is essential.

Please implement and execute the proposed regulations.

Thank you,

Luis Mirón
Distinguished Visiting Professor
University of Holy Cross
New Orleans, La.

Carrie Wiebelt

From: Dorcas Brown <dorcas@countryroadsmag.com>
Sent: Saturday, August 19, 2023 12:58 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane gas rule

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I very much support the changes to the methane gas rules. Actually wish they had no loop holes.

Please support this.

Sent from a Country Road!
Dorcas Brown
225-938-8664

Carrie Wiebelt

From: Anne McGinnis <alcmcg@gmail.com>
Sent: Saturday, August 19, 2023 1:04 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Doing any kind of emissions restrictions is better than nothing at all

Sent from my iPhone

Carrie Wiebelt

From: Dr. Alice Washington-Edwards <mindinfo2906@juno.com>
Sent: Saturday, August 19, 2023 1:03 PM
To: Carrie Wiebelt; contact@togetherla.org

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Carrie Wiebelt
Petroleum Scientist Administrator, Division Director
Office of Conservation
Department of Natural resources
Baton Rouge, Louisiana 70802

Greetings Ms. Wiebelt:

It has come to my attention that LDNR has issued a draft rule that will end the practice of routine venting and flaring for many oil wells throughout Louisiana. Currently, there are too few if any significant limitations on routine venting and flaring of methane at oil wells. I am writing to support the establishment of this rule.

- A primary benefit of this rule is the reduction of toxic air pollution which I consider so important to the health and welfare of citizens of the state of Louisiana.
- The rule will help reduce methane gas emissions, which is one of the leading causes of climate change.
- The rule will cause an increase in state revenue, by preventing the waste through burning of over \$16 million in methane gas per year, enough gas to fuel every household in Baton Rouge for over a year and a half!
- We must strive to strengthen the rule to assure the "economic hardship" exception is not used as a loophole.
- I believe this rule represents a big step in the right direction.

Please accept my statement as public comment in support of Louisiana Department of Natural Resources effort or any other hearings or effort to make this important rule final.
Thank you for your effort to help make it happen!

Respectfully, submitted,
Dr. Alice Washington
NASW-N; NASW-LA; TBR

Carrie Wiebelt

From: Julie Hoffman <juliexhoffman@gmail.com>
Sent: Saturday, August 19, 2023 1:08 PM
To: Carrie Wiebelt; Together Louisiana
Subject: Please end routine venting and flaring...

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

As a longtime citizen of Baton Rouge who loves Louisiana, I'm asking you please to support ending the practice of routine venting and flaring for many oil wells throughout our state. As you know, the proposed rule will help reduce air local pollution, which is so bad in Louisiana already, and have a positive effect on the overall climate...If it gets any hotter in the summers here, I'm going to start thinking about moving. My highly educated and productive children have already left the state, and poor air quality is one of the reasons they're not likely to return.

Thank you for your consideration,

--

Julie Hoffman
225-229-5645

Carrie Wiebelt

From: Nayyir Ransome <nayyirransome@gmail.com>
Sent: Saturday, August 19, 2023 1:11 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Cut The Emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Carrie Wiebelt,

The question we currently facing as a region is, “Are we going to thrive?”

For longer than any of us would like to admit or acknowledge Louisiana has fallen behind in almost every metric that measures the prosperity of our state.

The decisions that our leaders and law makers have made on multiple fronts have been counter to the well-being of Louisiana citizens and overly permissive to corporate interests.

When will Louisiana learn its lesson?

Right now, you are allowing the venting and flaring of methane gas at oil wells to continue unchecked.

Not only is it a waste of \$16 million dollars in potential revenue, it’s a health hazard to already vulnerable communities.

What message are we sending to our children and the rest of the country when we continue to throw away valuable lives and natural resources?

What message are we sending when we create policies with gaping loopholes that allow continued social, economic, and environmental harm to persist without consequence?

It is time that we valued ourselves, our citizens, our economy, and our resources.

Stop flaring and venting methane gas. Stop poisoning our air. Preserve our precious natural resources and propel Louisiana to a healthy future.

Sincerely, your humble, engaged, and concerned citizen,
Nayyir A. Ransome

Carrie Wiebelt

From: Keith Morgan <kmorganmac@gmail.com>
Sent: Saturday, August 19, 2023 1:15 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane gas emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I want to voice my support for the proposed rule by LDNR to eliminate the routine venting of methane gas from oil wells in Louisiana. My wife has a chronic lung disease and frequently must avoid outside activity due to air pollution. As the temperature rises the effects of the air pollution are multiplied by the heat, greatly reducing the quality of life for many Louisiana citizens.

Sent from my iPhone

Carrie Wiebelt

From: Andrea Amar <namar73061@yahoo.com>
Sent: Saturday, August 19, 2023 1:17 PM
To: Carrie Wiebelt
Subject: New Methane Flaring Rule

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

It is high time that Louisiana address the issue of methane emissions. Please make this rule permanent.

I just wish we could undo the damage that has already been done. We are already seeing the effects in our weather extremes.

Sent from Yahoo Mail on Android

Carrie Wiebelt

From: Bobby Edwards <bedwardskarate@gmail.com>
Sent: Saturday, August 19, 2023 1:18 PM
To: Carrie Wiebelt; contact@togetherla.org

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

This planet suffers from many toxic elements. Please Stop this emission. Than k You

Carrie Wiebelt

From: Richard J Brazan Jr <chrichie2@cox.net>
Sent: Saturday, August 19, 2023 1:26 PM
To: Carrie Wiebelt
Subject: Routine Venting and Flaring of Methane Gas

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

For years I have always wondered why the venting and flaring was happening and what affect it would have on the climate. Have always wondered if it was a problem because my experience with large companies has been that they make decisions based on finances and not ecological considerations.

Years ago the plants in St. James Parish had weekly incidents of release of chemicals into the waterways leading to Lake DesAllemands. Soon, the lake, was dead with no fish or plants. Once stopped the lake has come back to life with fish, crabs, plants and other animals. Maybe stopping the venting and flaring of Methane gas will accomplish the same thing for the air, less pollution.

Also, please define "economic hardships" better so it cannot be abused and be used as a reason to continue venting and flaring. Have a great day.

Carrie Wiebelt

From: Vann Joines <vannjoines@gmail.com>
Sent: Saturday, August 19, 2023 1:33 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: LDR Limiting Venting & Flaring - Public Comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I am writing in support of LDR's proposed rule to limiting the venting and flaring of methane at oil wells.

As a resident of Louisiana for 20 years, I have seen my power and gas bills consistently increase, with the price of oil and natural gas climbing to record highs, while the undeniable links between human activity and the rapidly changing climate are seen not only in our inability to hunt ducks in this former Sportman's paradise, as ducks rarely migrate to Louisiana anymore, but more frequent and ferocious storms that have lead to my homeowners insurance costs increasing by over 500%.

This lack of regulation of oil and gas wells is providing an unneeded subsidy to the oil and gas producers, during this era of record oil & gas prices, while both increasing the severity of climate changes and needlessly wasting valuable fuels that could supply heat and power to households across our state.

The oil industry no longer has standing for an economic hardship argument, and I urge that this rule to limit venting and flaring becomes effective immediately.

Thank you for your consideration and service to our state.

Vann Joines
4208 Dauphine St
New Orleans, LA 70117

--

Vann Joines, MSRED

(504) 410-6250
vannjoines@gmail.com

Carrie Wiebelt

From: Kinya Lennix <kinile21@gmail.com>
Sent: Saturday, August 19, 2023 1:36 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Cut Methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To whom it may concern,

I am a life long resident of the state, and I am all for The reducing of any emissions in Louisiana. If there is a way to cut down any of the many pollutants that Louisiana already releases to its residents, by all means, please do it. We already have every plant known to man releasing all types of chemicals, so please, if there is a way to cut Down on something, anything, let's do it. If not For Us, then for our children.

Sent from my iPhone

Carrie Wiebelt

From: courtney egan <courtney@courtneyegan.net>
Sent: Saturday, August 19, 2023 1:37 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: methane emissions comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please accept this comment about methane emissions.

As a resident of south Louisiana, it's no surprise to me that emissions are currently unregulated and uncontrolled. The energy and chemical industries are given free reign to do whatever they want here in LA, at the expense of the health of the citizens.

And here we are in the hottest summer in LA in recorded history.

Please, please for my child's sake if you won't do it for voting citizens, please regulate these industries, and don't allow the "economic hardship" exception to be used as a loophole.

Right now there are no limits on flaring and emissions at oil wells.

I want there to be regulations and oversight. The oil industry has proven that it will do anything it can to continue squeezing record profits out of us.

Courtney Egan

--

www.courtneyegan.net

Carrie Wiebelt

From: Janet Wing <janet.wing@gmail.com>
Sent: Saturday, August 19, 2023 1:42 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: I support ending the practice of venting and flaring oil wells in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Carrie Wiebert, LDNR Office of Conservation,

Air quality is important to me and I'm writing to you to voice my support to end venting and flaring oil wells into the atmosphere.

I recognise Louisiana relies on oil and gas production for jobs and revenue. Why are we not working to use this resource more efficiently rather than waste it for the convenience of well operators? There has got to be a better solution!

If it takes legislation to spur innovation, so be it. Our environment is on loan from future generations. Please support limiting flaring and venting of wells.

Regards,
Janet Wing

Carrie Wiebelt

From: D <djligh3@gmail.com>
Sent: Saturday, August 19, 2023 1:54 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Flaring and venting of wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Carrie Wiebelt,

As a resident of south Louisiana I am writing in support of restrictions/prevention of routine venting and flaring of oil wells in our region.

Methane is a known potent greenhouse gas that if allowed to be released routinely into the atmosphere can greatly worsen climate change.

In addition, Methane is a potent source of energy and can be used in more productive processes if needed. By allowing this routine practice we are not only wasting resources but directly contributing to climate change with no benefit.

Thanks you for your time,

Daniel Lightell Jr.

Carrie Wiebelt

From: Marilyn <cazayouxm@gmail.com>
Sent: Saturday, August 19, 2023 2:02 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Stop flarings!!

Marilyn

Carrie Wiebelt

From: Elizabeth Widerquist <eswiderquist@gmail.com>
Sent: Saturday, August 19, 2023 2:02 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: please support new rule to end routine venting and flaring of oil wells in LA

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hello,

I write to express my agreement with the proposed rule to end routine venting and flaring of oil wells in Louisiana. The following points support the final decision to end this practice that contributes to toxic air and illness for Louisiana citizens.

- Right now there are virtually no limitations on routine venting and flaring of methane at oil wells
- This rule will reduce toxic air pollution
- The rule will help reduce methane gas emissions, which is one of the leading causes of climate change.
- The rule would INCREASE state revenue, by preventing the waste through burning of over \$16 million in methane gas per year. (That's enough gas to fuel every household in Baton Rouge for over a year and a half!).
- If anything, the new rule would make sure the "economic hardship" exception is not used as a loophole.

Thank you for your attention to this important matter of passing this new rule that will literally save and improve the lives of so many Louisiana citizens if passed.

Very Sincerely Yours, Elizabeth Widerquist

--
"JUSTICE IS WHAT LOVE LOOKS LIKE IN PUBLIC."--Cornel West

Elizabeth Smith Widerquist, Ph.D.
1314 Napoleon Ave., #3
New Orleans, LA 70115

h(504)897-5380
w(504)520-5115
c(504)343-7595

Carrie Wiebelt

From: Jim VanderWeele <revjvanderweele@gmail.com>
Sent: Saturday, August 19, 2023 2:09 PM
To: Carrie Wiebelt; Together Louisiana
Subject: Venting methane: hoisting on our petard

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Carrie Wiebelt, LDNR Office of Conversation,

In the midst of this very hot summer, I have been reflecting on an ongoing practice in Louisiana to hoist ourselves on our petard. I was drawn to the effort to protect our planet for human habitation because my children and grandchildren have pointed out the jeopardy their generation feels about the very prospect of living on our planet in the years to come.

This concern for human survivability has, sadly, risen again in the wake of the lives recently lost in the Lahaina wildfire, as well as the 100 wildfires which have already erupted in the State of Louisiana.

If there was ever a time to consider more highly the needs of our people (to rank their needs above the desires of its corporate captains) it is now. Please consider not only the impact of new jobs, new methods, or new potential revenue streams by favoring more highly the protection of life, health, and human welfare.

A vote for reducing methane emissions not only helps protect human survival on our most beautiful and precious planet Earth, it also allows for the protection of all forms of life on our Earth.

With hopes and prayers for the planet's health, made possible by your agency's decision to stop hoisting Louisiana up its own petard,

Rev. Jim VanderWeele
he/him/his

Live Loving; Love Living

Carrie Wiebelt

From: Wendy King <wking70118@yahoo.com>
Sent: Saturday, August 19, 2023 2:12 PM
To: Carrie Wiebelt
Subject: Draft rule ending routine practice of venting and flaring for wells throughout Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Administrator Wiebelt,

I support the proposed rule by which the state stops allowing methane gas to be burned by oil wells through routing venting and flaring.

I understand that our state does not limit routine venting and flaring of methane gas from wells in Louisiana. Methane is a greenhouse gas, and a major contributor to global warming and climate change. The companies operating these wells should not be disposing of methane gas by venting and flaring it into nearby communities.

With this rule, there will be less toxic air pollution, and, for me, cleaner air.

This rule could increase state revenue, and prevent waste through burning over \$16 million in methane gas per year.

Please strengthen this proposed rule, so that "economic hardship" is not used as a loophole for evading this rule.

Sincerely,
Wendy King
2100 St. Charles Ave., #9J
New Orleans LA 70130
504-919-0432

Carrie Wiebelt

From: Clayton Weeks <ibikefast@gmail.com>
Sent: Saturday, August 19, 2023 2:38 PM
To: Carrie Wiebelt; contact@togetherla.org

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am opposed to venting gasses into the atmosphere. It is the responsibility of the well or plant owner to ensure that all emissions are kept to a minimum.

Additionally, all unused or abandoned wells should be properly terminated.

Carrie Wiebelt

From: Jack K. Whitehead, Jr. <jwhitehead@whitehead-law.com>
Sent: Saturday, August 19, 2023 2:41 PM
To: Carrie Wiebelt; ", contact@togetherla.org,"@mx0a-00188601.pphosted.com; contact@togetherla.org
Subject: [EXT]gas flare rule

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Louisiana should tighten up the current rule and limit gas flares as proposed in the new rull.

Respectfully,

Jack K. Whitehead, Jr.
Managing Member
Whitehead Law Firm
11909 Bricksome Avenue, Ste W-3
Baton Rouge, LA 70816
Telephone: (225)303-8600
Facsimile: (225)303-0013
Mobile: (225)938-5857

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Carrie Wiebelt

From: Charles Perilloux <perichas2@gmail.com>
Sent: Saturday, August 19, 2023 2:48 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: I do not support the proposed rule for methane venting

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Agreed: we should reduce green-house gases

I agree that the climate is changing, at least in part because of green-house gases such as CO2 and methane. I believe that reducing those emissions in the most efficient way possible is a legitimate international objective. I personally was instrumental in developing and applying technology for the 99% abatement of the much more potent nitrous oxide, NO2, an inherent by-product of making nylon. That was implemented more than 25 years ago through-out the U.S. and Europe, by a voluntary consortium led by the DuPont company, the inventor of nylon. The beneficial impact was huge, and the cost was tolerable. So high-volume oil wells and refineries have already implemented recovery of natural gas: the cost savings were worth the investment.

But economics matter - a lot

But I am opposed to any rules that seek to minimize green-house gas emissions without any reference to economics. The objective has to be to minimize climate change in ways that cause the least damage to the economy. If we adopt new regulations that add to costs in the U.S., while China and India do little, we destroy high-paying jobs in America.

I have not read in detail the proposed rules, and those rules were not sent out by Together Louisiana in asking for comments. But I believe I am likely more qualified to have an informed opinion on this matter than most of those who are responding to their call. I understand how government actions impact the economy. I am opposed to the draft rule regarding venting and flaring of methane from oil wells in Louisiana. The oil and gas industry in Louisiana already has a financial incentive to avoid wasting natural gas, and that financial incentive is even greater than the revenue the state would get. The only wells that do not recover vented methane are small ones where the cost of recovery exceeds the value of the natural gas lost.

The “loophole” that mentions “economic hardship” is not a loophole, it is a fact that small wells do not vent enough methane to justify the cost of recovery. Forcing them to do so will simply hurt the owners of small properties for which the cost of recovery exceeds the value of the gas vented.

Methane is a green-house gas, and is flammable, but it is not “toxic”, any more than the CO2 we exhale is toxic. Cows produce methane, but it is not toxic to the cows. Louisiana could indeed require dairy farmers to install filters on vent stacks from barns to trap the methane and CO2 emitted from cows. That may be economically feasible in some cold-weather places, but not likely in warm climates where cows spend little time indoors. But even so, it would increase the cost of milk, and hurt dairy farmers in Louisiana.

A better option: the greatest common good for the lowest cost to the people

The most efficient mechanism for reducing green-house gases, such as CO₂, is to tax all emissions in proportion to their green-house gas potential, including CO₂, while reducing other taxes to be net neutral. I would support a state initiative or national initiative to do so. Those opportunities where recovery or abatement would be cheaper than the tax, would be implemented. Those for which the emissions are too small to justify the cost, would continue: that is by far the most efficient mechanism. It achieves the greatest common good for the least cost to the public.

The industry that generates the greatest net income in Louisiana is oil and gas, and petrochemicals, including the construction industry that supports it. Most other employment in Louisiana, such as restaurants, medical care, house construction, and government and non-profits, simply take money from one Louisiana pocket and put it in another Louisiana pocket (while deducting "transfer costs" in the process). From whence comes the money to pay for those goods not produced in Louisiana?

We live in a competitive world economy. Any action that add to costs in the U.S. but not in China, drives more jobs out of the U.S. Any action that adds to industry costs in Louisiana, but not in Texas, makes Louisiana that much less competitive. Louisiana overall is the slowest growing population and economy in America. It is not likely that any of my grandchildren will stay when there are better opportunities elsewhere.

Charles Perilloux, retired engineer
perichas2@gmail.com
16046 Highland Bluff Ct.
Baton Rouge, LA. 70810
225-753-2182
225-244-1943 cell and text

Carrie Wiebelt

From: joe bowie <bowie740426@bellsouth.net>
Sent: Saturday, August 19, 2023 2:55 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Pollution

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

PLEASE end the practice of routine venting and flaring for many oil wells throughout Louisiana. I would like to live in a world with less pollution. I would like to have my children and their children have a better life experience. Close all loopholes and for God sake think of the people you suppose to serve and not big corporations! Keep the earth safe! Stop the greed!!!

Sent via the Samsung Galaxy A13 5G,an AT&T 5G smartphone
Get [Outlook for Android](#)

Carrie Wiebelt

From: jylbenson@gmail.com
Sent: Saturday, August 19, 2023 3:09 PM
To: Carrie Wiebelt
Subject: LA is the poster child for climate change

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear MS. Weinbolt (LDNR Office of Conservation)

This state needs to stop allowing methane gas to be burned by oil wells through routing venting and flaring. We are being eaten alive by the fallout from climate change. We need help. Right now there are virtually no limitations on routine venting and flaring of methane at oil wells. Toxic air pollution must be reduced. My daughter has already left the state because of the toxic nature of living here. Do we need to lose more people? Reducing methane gas emissions will assist in curbing climate change. The rule would INCREASE state revenue, by preventing the waste through burning of over \$16 million in methane gas per year. If anything, strengthen the rule to make sure the "economic hardship" exception is not used as a loophole.

Thank you. This is really getting old.

Jyl Cecilia Benson
Writer.Editor.Recipe Developer
New Orleans
jylbenson@gmail.com
504.913.4747

Carrie Wiebelt

From: Valeri Leblanc <valeri.leblanc@gmail.com>
Sent: Saturday, August 19, 2023 3:16 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Please cut methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Methane emissions need to be cut everywhere they can. Likely venting of gas is one of the easiest ways. Please make this happen. Thank you.

Valeri leBlanc

Sent from my iPhone

Carrie Wiebelt

From: kelly ward <klwrd21@gmail.com>
Sent: Saturday, August 19, 2023 3:23 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Restrict the release of methane gas through flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I know that there is a period of public comment regarding regulatory rules regarding the release of methane gas into the atmosphere. There are a whole hosts of technology that can be effective to prevent the release of harmful elements into our atmosphere. It is reasonable to require our industries to upgrade systems to prevent those releases. Most of our legacy industries have significant profits that could be used to finance those systems. In addition, most of those industries have received tax relief either through ITEP tax deferments or other tax offsets. Just today I drove past many of those industries with flares a blazing. The outside temperature on my car gauge registered 103 F. We have routine air quality warnings that go along with our record heat. Please require responsible action from those industries as if our life and health depended on it.

Sent from my iPhone

Carrie Wiebelt

From: Mark Watson <mwatson@stmaryshreveport.org>
Sent: Saturday, August 19, 2023 3:47 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Public Comment about Burning ang Flaring of Methane Gas by Oil Wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I ask that the rule to not allow the burning of Methane Gas is put into law.

Burning methane gas by Oil Wells wastes methane gss and exacerbates Climate Change.

Fr. Mark Watson
Pastor
St. Mary of the Pines Catholic Church
Shreveport, La. 71118

Carrie Wiebelt

From: salvar84@gmail.com
Sent: Saturday, August 19, 2023 3:58 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Opposition to venting and flaring of methane gas

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wiebelt,

Louisiana is my home. I want to do everything I can to keep my home a safe and a healthy place to live. Louisiana should take actions that protect our quality of life, our health and that of our children, because Louisiana kids tend to stay close to home ❤️. As a child of many, many generations dating back to the 1700's, I request that the practice of venting and flaring methane gas burned by oil wells be stopped forever. Louisiana must do its part to reduce pollution and prevent the ramifications of climate change. The term, "economic hardship" needs a most narrow and direct definition that is not open to interpretation or abuse, or better yet, be eliminated completely. Our state is not known for doing right by our people when making difficult decisions dealing with business and industry. Let's get this one right for the good people of this state.

Thank you,
Sally Woods Alvarez
Mandeville, Louisiana

Sent from my iPhone

Carrie Wiebelt

From: David Harms <davidharms1981@gmail.com>
Sent: Saturday, August 19, 2023 4:23 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Restrictions on Venting Methane Gas

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I understand that the Louisiana Department of Natural Resources is considering a new rule that would restrict venting and flaring natural gas. I am writing to support the proposed restrictions and request that the language around economic hardship exceptions be removed. As a long time resident of Louisiana, I see no reason why oil and gas producers in our state should not be held to the highest operational and environmental standards. Providing an exception just invites a race to the bottom in the quality of operators interested in working in our state, by forcing the better operators to compete against under capitalized outfits cutting corners.

Thank you for your consideration.

David Harms
New Orleans, LA

Carrie Wiebelt

From: ksg6547@gmail.com
Sent: Saturday, August 19, 2023 4:40 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: I sent to her above.

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

A major cause of green house gases. Isn't this weather enough for folks to realize we are/have slowly been killing the earth with our greed?

We must act SOON! It may already be too late. The legislation is less than perfect but it is a start!

So capture the gas that is burned off.
Is burning it off and killing the world a cheaper way for the greedy?
Kathryn shaw

Carrie Wiebelt

From: rosemary goodell <rosemary.goodell@gmail.com>
Sent: Saturday, August 19, 2023 4:50 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Venting and flaring methane gas

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am writing to submit a public comment to urge the state commission to stop allowing the venting and flaring of methane gas by oil companies.

Please stop this toxic pollution. All venting and flaring costs Louisiana taxable revenue and is worsening our heat emergencies.

Sincerely,
Rosemary Goodell

Also please make sure the exception of economic hardship is not used as a loophole in light of the record profits these companies make.

Sent from my iPhone

Carrie Wiebelt

From: Ann O'Neill <ann.oneill@apsb.org>
Sent: Saturday, August 19, 2023 4:51 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: END ROUUTINE VENTING & FLARING OF OIL WELLS

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Mrs. Weibelt,
Please put an end to venting and flaring of oil wells in our state. As the mother of an 18-year old that struggles with Autism Spectrum Disorder, ADHD, Intellectual Disability and Type 1 Diabetes PLEASE reduce the toxics in our environment.

I speak not only as a mother but also as a teacher who has seen an increase in the number of students diagnosed with Autism and Intellectual Disabilities.

Sincerely,
Ann O'Neill

Carrie Wiebelt

From: Bob Stuckart <stuckart@gmail.com>
Sent: Saturday, August 19, 2023 5:06 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Venting pollution

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Stop the venting and polluting of our air. We have enough illness in LA without adding to the problem.

Stuckart@gmail.com

Carrie Wiebelt

From: Samantha Morgan <samanthamorganmedia@gmail.com>
Sent: Saturday, August 19, 2023 5:18 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Public comment to cut methane emissions in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I hope this letter finds you in good health and high spirits. I am writing to express my deep concern about the current practice of routine venting and flaring of methane gas at oil wells in the state of Louisiana. I strongly believe that the state should take immediate action to discontinue this practice, and I would like to provide you with several compelling reasons for doing so.

First and foremost, it is alarming that there are virtually no limitations on routine venting and flaring of methane at oil wells in our state. This practice not only leads to the wasteful burning of a valuable resource but also contributes significantly to the release of toxic air pollutants into our environment. This unregulated venting and flaring have a direct and detrimental impact on the health and well-being of our communities, including my own. Therefore, implementing a rule to curb these emissions is paramount.

Reducing toxic air pollution should be of utmost importance to all Louisianans, including yourself. We must recognize the urgent need to protect our air quality, as it directly affects our health and that of future generations. The rule I advocate for will not only safeguard the air we breathe but also contribute to the overall improvement of our environment.

Moreover, addressing the routine venting and flaring of methane gas is critical in the fight against climate change. Methane is a potent greenhouse gas, and its release into the atmosphere significantly contributes to global warming. By implementing this rule, Louisiana can play a pivotal role in reducing methane emissions, aligning our state with the broader international efforts to combat climate change.

Furthermore, it is worth highlighting that this rule has the potential to increase state revenue. The wasteful burning of over \$16 million worth of methane gas annually is not only environmentally irresponsible but economically unsound. By preventing such waste, we can redirect these resources towards more productive uses. To put it into perspective, the saved gas would be enough to fuel every household in Baton Rouge for over a year and a half. This financial benefit should not be overlooked as it can positively impact our state's finances and the well-being of our citizens.

Lastly, while advocating for the rule, it is crucial to ensure that the "economic hardship" exception is not exploited as a loophole. Stronger measures should be in place to guarantee that companies adhere to the regulations without exception, to protect both our environment and our economy.

Personally speaking, I spent over twenty years in local media and produced an entire podcast season about the climate crisis with specific focus on the impacts in Louisiana. The complexities of this issue are not lost on me, but I truly believe we can serve as a positive example of progress in this area.

Thank you for your attention to this matter, and I look forward to seeing positive action taken to protect our environment and our future.

Sincerely,



Samantha Morgan

(225) 229-1312

samantha@quickflipmedia.com

[Facebook](#) | [Instagram](#)

[LinkedIn](#) | [YouTube](#)

Content for every screen

Carrie Wiebelt

From: Medria Taylor Buford <medriataylor79@gmail.com>
Sent: Saturday, August 19, 2023 5:31 PM
To: Carrie Wiebelt; Together Louisiana
Subject: Help Me!

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Greetings,

To date it seems that there are hardly any limitations on common venting and flaring of methane at oil wells in the state. The proposed rule will be a start in what I hope will be a strategic fight to reduce toxic air pollution. I currently suffer from sinus issues as a long lasting effect of COVID.

Reduction in methane gas emissions, one of the leading causes of climate change, could also be included in this plan. Not to mention growing the states revenue by almost \$16 million per year.

Often times situations like this are can result in loopholes. Let's ensure that economic hardship isn't used in this matter by making the rule stronger.

I ask you to please help in the fight to stop oil wells from being allowed to burn off methane gas through venting and flaring.

Kindest Regards,

Medria Buford

Carrie Wiebelt

From: ksg6547@gmail.com
Sent: Saturday, August 19, 2023 5:42 PM
To: Carrie Wiebelt
Subject: Help! Methane is

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

A major cause of green house gases.

Isn't this weather enough for folks to realize we are/have slowly been killing the earth with our greed?

We must act SOON! It may already be too late. The legislation is less than perfect but it is a start!

Imagine if we captured all that gas and used it instead of padding the pockets of the likes of EXXON?

Thanks,
Kathryn shaw

Carrie Wiebelt

From: Robbie Robertson <weareterradorphins@gmail.com>
Sent: Saturday, August 19, 2023 5:49 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: venting and flaring of oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please end the practice of routine venting and flaring of oil wells throughout Louisiana. Wiliam C. Robertson, New Orleans, 70118

Carrie Wiebelt

From: Joyce Young <joyceyoung91940@gmail.com>
Sent: Saturday, August 19, 2023 6:02 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Proposed ruling re routine methane burning.

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

As I have learned , Methane along with Carbon Dioxide is one of the top pollutants contributing not only to climate change but to our respiratory and Other diseases we are plagued with.

Eliminating the routine burning off could only improve the quality of the air we breathe ! Please do what needs to be done to stop this practice!

Sent from my iPhone
Joyce young

Carrie Wiebelt

From: Nellie Gonsoulin <nellgonsoulin@gmail.com>
Sent: Saturday, August 19, 2023 6:07 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Routine Venting by Oil Wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am not in favor of routine venting of oil wells which can give off toxic chemicals into our environment. We need a law that prevents this from happening. Thank you for your consideration of my opinion.

Nellie Gonsoulin

Sent from my iPhone

Carrie Wiebelt

From: Rick Moreland <bamboofarmer@gmail.com>
Sent: Saturday, August 19, 2023 6:14 PM
To: Carrie Wiebelt; Together Louisiana
Subject: Proposed amendment to current rules on venting methane

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms Wiebelt,

My name is Dr. Rick Moreland, and I'm writing to comment on the proposed amendment to Louisiana's current rules on venting methane, which I've been reading about and hearing discussed.

First, kudos to the Department for addressing this problem, which I've been hearing about for years, not just in Louisiana but throughout the oil and gas industry. We have so much more of that industry here, of course, that it's all the more important that we address. This proposed amendment looks like a big step in the right direction. Thank you.

One big potential problem, however, is the exception for "financial hardship," which could undo a lot of the progress that this proposal is meant to achieve. One suggested fix I've heard that makes good sense to me is to add, first, much more well-defined state-level guidance about what would qualify for such exceptions, and second, more transparency, that is, timely public access to details about what exceptions are being made or considered. I hope the Department adopts something close to these suggestions.

In short, this amended rule is attempting to cut down on venting and leaks--we want to be sure the rule itself doesn't leak.

Thank you,

Dr. Rick Moreland
Professor Emeritus, LSU

Carrie Wiebelt

From: Krista Roche <kristaroch@cox.net>
Sent: Saturday, August 19, 2023 6:56 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane Venting

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hello,
When we travel around in Louisiana especially in the southwest part of the state we see so much evidence of methane venting. It always disturbs us, and we would like something to be done about it.
Krista and Jim Roche

Sent from my iPhone

Carrie Wiebelt

From: Rosey Kamerer <kamererrosey@gmail.com>
Sent: Saturday, August 19, 2023 7:51 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane waste emissions and flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

While I support the oil and gas industry, I do see a need to control emissions. It will be great if the methane can be captured and used productively. I hope we can benefit from this regulation

Sincerely,

Rose Kamerer OFS

Carrie Wiebelt

From: lmcprog <lmcprog@gmail.com>
Sent: Saturday, August 19, 2023 8:21 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: In favor of prohibition of venting from oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I am writing in support of the prohibition of venting and flaring from wells in Louisiana. Not only is venting a significant source of gas waste (\$16 million in methane waste in 2019), the methane released is a powerful greenhouse gas with 84 times the warming power of CO₂ over a 20-year period.

The impact of climate change is already apparent, and immediate action is necessary if we are to change the trajectory of our worsening weather. It is time to act responsibly and stop this waste of resources.

Thank you for your attention,

Laura McColm
Lafayette

Carrie Wiebelt

From: Karen Babin <ksbabin@gmail.com>
Sent: Saturday, August 19, 2023 10:05 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane Flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

This is a practice that is wasteful and VERY damaging to our environment. Climate change has reached crisis proportions. EVERY action to mitigate harmful practices needs to be taken ASAP.

Karen Babin
ksbabin@gmail.com
504-875-4342
Metairie, LA 70001

Sent from my iPhone

Carrie Wiebelt

From: JoAnn Garma <jgarma2@me.com>
Sent: Saturday, August 19, 2023 10:25 PM
To: Carrie Wiebelt
Subject: Restrictions needed for methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please! Take action to restrict, to decrease the methane emissions by oil companies. Consider the health hazards to those in the surrounding communities. I personally am surprised that this is 2023 and little to nothing has been done.

Please be proactive with this issue!

Thank you,

JoAnn M Garma
218 E Gatehouse Drive, Apt. E
Metairie, LA 70001

Sent from my iPhone

Carrie Wiebelt

From: Diana Hernandez <dmmd4444@gmail.com>
Sent: Saturday, August 19, 2023 11:34 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Stop methane emissions in Louisiana - public comment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms Wiebelt,

I request that the State stops allowing methane gas to be burned by oil wells through routing venting and flaring; and I also request that the draft bill remove the language allowing an exception for "economic hardship," as you know all companies who practice burning methane gas would abuse this language as a loophole to not follow the rule.

South Louisiana has seen unprecedented record high temperatures, with heat waves and "state of emergencies" at an all-time long run. The rule to end the practice of routine venting and flaring for many oil wells throughout Louisiana will drastically reduce the toxic chemicals that are eroding our ozone layer, which directly correlates to the climate change crisis that we are experiencing worldwide. We won't last many more generations on this earth without our ozone layer protecting us. Please strengthen and pass this rule, so that we may clean up our atmosphere, and make conscious efforts to heal the earth of the pollution we've created.

Very Respectfully,

Diana M. Hernandez
Strategic PR & Marketing Consulting
dmmd4444@gmail.com

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Carrie Wiebelt

From: Glenda Veal-Gayden <gmveal@yahoo.com>
Sent: Sunday, August 20, 2023 4:56 AM
To: Carrie Wiebelt
Subject: Stop the burning!

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please stop the burning of the methane oil in our area. We have enough odds against us bringing us faster to chronic health conditions that we don't have enough control of to opt out of. Thank you.

Sincerely,
Glenda Veal

Sent from Yahoo Mail for iPhone

Carrie Wiebelt

From: Susan Heflin <susancheflin@gmail.com>
Sent: Sunday, August 20, 2023 5:07 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Rule to End the Practice of Routine Venting & Flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am in favor of the LDNR's rule to end the practice of routine venting and flaring by many oil wells throughout Louisiana for the following reasons:

- It will reduce toxic air pollution, and I'm in favor of that. Shouldn't everyone be?
- It will reduce methane gas emissions, which is one of the causes of climate change, and I think it's about time people in Louisiana took climate change seriously.
- It will reduce waste by decreasing the burning of millions of dollars of methane gas unnecessarily.
- The routine venting and flaring of methane gas at the discretion of business is trusting our air quality to a source whose bottom line is profit. Is that what we want to do? I'd prefer to trust the quality of the air I breathe to entities who have the public interest at heart.

Thank you,

Susan C Heflin
7964-G Wrenwood Blvd.
Baton Rouge, LA 70809
(225) 241-9408 Cell
susancheflin@gmail.com

Carrie Wiebelt

From: Charles Williams <chazbizz91@gmail.com>
Sent: Sunday, August 20, 2023 8:29 AM
To: Carrie Wiebelt; Together Louisiana
Subject: Methane venting

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wiebelt,

I grew up in Monroe near a gas well on Loop Road and recall the frequent odors and burning. That was in the 50s and 60s! I can't believe the State of Louisiana still allows this. I support the proposals to tighten and limit our regulations on venting of methane.

Charles Williams, Greenwell Springs, LA

Carrie Wiebelt

From: sarah dearie <deariedeoliveira@hotmail.com>
Sent: Sunday, August 20, 2023 9:35 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane gas emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please protect our environment for the future of our children. End the flaring of natural gas. Why must Louisiana be known as Cancer Alley? We need to eliminate toxic industry in our state.

Thank you,
Sarah Dearie

Sent from my iPhone

Carrie Wiebelt

From: Maggie Conarro <maggie.conarro@gmail.com>
Sent: Sunday, August 20, 2023 10:00 AM
To: Carrie Wiebelt
Subject: In favor of the proposed rule limiting venting and reducing waste

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi Ms. Wiebelt,

I'm writing to you in favor of the proposed rule to limit flaring and for operators to manage their own idle wells.

The rule is a common sense step in the right direction reducing both dollar costs and environmental harm to families in Louisiana, but it also sends a hopeful message that our state is ready to do the common sense things that help our people and our community.

In my role as Program Director with Serve Louisiana, I work with recent graduates who commit to a year of service at organizations around the state. Many of our members come to the program with environmental degrees, eager to help improve lives and health outcomes for people in our state. These emerging leaders do everything from restore the coast, reduce urban heat and pollution through urban forestry, and improve food access with community farms and gardens. They spend their year building barrier reefs out of recycled oyster shells, starting compost projects and food sharing programs to reduce waste, and thinking creatively about how they can make a positive impact in their year.

But our members - many of them 20 somethings - have no false hopes of what the future holds with climate change in our home state, and this summer we've seen glimpses of that bleak reality with record highs and unprecedented drought. So while they celebrate strides like the recent Mid- Barataria Sediment diversion ground breaking, they're skeptical that the state won't continue doing the same backwards things that have exacerbated the issues and accelerated the crisis- often to the benefit of few and the detriment of many.

I ask that you please take this comment into consideration with the upcoming proposed rule. There's a whole generation of Louisianians taking note of how our state responds to the climate crisis over the next few years, and when they calculate the risks of staying here, they're considering every time we missed a win-win opportunity for our people and our planet.

Best,
Maggie Conarro
Baton Rouge, LA

Carrie Wiebelt

From: marion freistadt <marionfreistadt@yahoo.com>
Sent: Sunday, August 20, 2023 10:03 AM
To: Carrie Wiebelt
Subject: "Venting and Flaring of Natural Gas"

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Carrie Wiebelt,

Louisiana Department of Natural Resources (LDNR).

Office of Conservation, Engineering Administrative Division,

P. O. Box 94275, Baton Rouge, LA 70804-9275

Aug. 20, 2023

Dear Dr. Wiebelt:

As per DOA notice (<https://www.doa.la.gov/media/xamlov5p/2307.pdf>), this is a public comment on the proposed regulation on "Venting and Flaring of Natural Gas." I am writing in SUPPORT of the regulations, although I provide a few suggestions for improving the regulations. Here are my reasons:

1. Venting and flaring of natural gas is very dangerous to the environment. "Natural gas" is methane, a major greenhouse gas, which impacts the climate directly through controlled or uncontrolled leaks (venting). Methane is 30 times more potent than CO2 in trapping heat. Flaring is unnecessary burning of methane. When methane is oxidized (burned or combusted) it produces CO2, the primary greenhouse gas. The rule rightfully proposes to prohibit both flaring and venting.
2. Considering the dangerous impact of venting and flaring, it is remarkable that no such rule already exists. Therefore, expeditious passing of the rule would be beneficial to all.
3. The proposed rule is for wells but should also apply to any industrial facility.
4. It is reported that \$16 million is lost every year through flaring, so this recovered money should, in part, be returned to the state in the form of income tax. That is, the rule would improve the Louisiana economy.
5. The rule could be improved by tightening up the exceptions. Several exceptions are listed:

- a. "...instances where permissible flaring as specified in §3507.B is not an economical or safe alternative." For example, case "a", cost to operator does not include externalized

health and environmental costs to residents, local environment and climate change through greenhouse gas emissions. a recent study calculates the social cost of methane at \$8,040 per metric ton in the US.

b. "...instances where the Office of Conservation finds, upon written application, that such prohibition would result in an economic hardship on the operator." Economic hardship to the operator should be balanced against economic hardship to the residents in the neighborhood and beyond.

c. "...venting or flaring during drilling, completion, and hydraulic fracturing operations." This seems like an arbitrary exception, since fracking operations should be held to the same conservation standards as other operations.

Thank you for your consideration.

Sincerely,

Marion "Penny" Freistadt, PhD, MBA

1539 Adams St. New Orleans, LA 70118

504-352-2142

<https://newscenter.lbl.gov/2021/04/21/in-calculating-the-social-cost-of-methane-equity-matters/>

Marion "Penny" Freistadt, PhD, MBA

504-352-2142

Carrie Wiebelt

From: Russell Futrell <rwfutrell@gmail.com>
Sent: Sunday, August 20, 2023 10:40 AM
To: Carrie Wiebelt; Together Louisiana
Subject: Venting & Flaring of Oil Wells in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Carrie Wiebelt
LDNR Office of Conservation

It is my understanding that currently in Louisiana there are virtually no limitations on routine venting and flaring of methane at oil wells. I also understand that LDNR has issued a draft rule that would end the practice of routine flaring and venting for many of the wells throughout Louisiana. This rule will reduce toxic air pollution in the state. Louisiana residents have been suffering for years from the toxic air, resulting in high cancer rates and asthmatic and other health conditions. Personally, I suffer from a lung condition attributed to working in Saudi Arabia during the Gulf War and the toxic air conditions resulting from the chemical fires flowing downstream from Kuwait. So, I am sensitive to the damage to our air quality caused by flaring and venting. Furthermore, I think it unconscionable that we allow this practice to continue and thereby threaten the health of our aged community and new generations of Louisianans. Additionally, the draft rule would help reduce methane emissions which is one of the leading causes of climate change, which negatively impacts Louisiana every year. I have read that the draft rule would in effect increase the revenue of the state by preventing waste through burning off \$16 million yearly that could otherwise be used for powering industry and Louisiana households. This rule would be a major step in the right direction toward improving the environment in Louisiana. I solicit your assistance in bringing this ruling to reality, while asking that you improve upon the ruling by ensuring the "economic hardship exemption" not be used as a loophole for abuse.

Sincerely,
Russell Futrell

Russell W. Futrell
4824 Mimosa Street
Mobile: +1-225-241-3537
email: rwfutrell@gmail.com

Carrie Wiebelt

From: Annette Sharp <asharp1952@gmail.com>
Sent: Sunday, August 20, 2023 11:30 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Flaring of Methane Gas

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt:

Flaring of oil and gas production processes creates greenhouse gases. Previously, flaring was used by producers for operational, safety, and economic reasons. Unfortunately, methane has a greater global warming potential than CO₂. Any methane release into the atmosphere contributes to global warming. While I support the elimination of flaring of methane gas and recycling of that gas into useful products, another concern is unintended consequences by allowing language of "economic hardship" to be included without any kind of definition of what that means.

Some of us have a jaundiced eye when someone from the oil and gas industry claims that there is an economic hardship in complying with a new standard. I would like language added that states that anyone asking for an economic hardship be compelled to produce a written plan for coming into compliance within three years of claiming an economic hardship. The plan should include the company's overall operational budget and profit earnings statements for the last five years.

Thank you for allowing me to provide comment on this all important issue in Louisiana.

Sincerely,

Annette H. Sharp
9656 Highway 43
Amite, LA 70422

Carrie Wiebelt

From: Jeanne Nathan <jnathan.ci@gmail.com>
Sent: Sunday, August 20, 2023 11:31 AM
To: Carrie Wiebelt; contact@togetherla.org

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please stop petrochemical Chem and other industries from polluting with burn off.

Carrie Wiebelt

From: Missy Cotita <cotitamissy@gmail.com>
Sent: Sunday, August 20, 2023 11:47 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I have lived in Louisiana most of my life, and love the culture and the people here! But I truly believe that there are many things about our state that we need to change! We seem to give industry the 'right of way' when it affects our health, quality of life, and environment. One issue being addressed now is the burning of waste methane at oil wells through routine venting and flaring. I believe the proposed rule will reduce air pollution, and methane emissions. This is one simple step in the right direction!! I do not see the downside!

I also believe that this practice is very wasteful and should be done only when absolutely necessary. Natural gas is one of our state's treasure, a useful resource that should never be wasted.

Please consider those of us in Louisiana who love the state, and hope for a better tomorrow!

Sincerely,
Missy Cotita

Sent from my iPad

Carrie Wiebelt

From: Elaine Shank <shankelaine@gmail.com>
Sent: Sunday, August 20, 2023 12:04 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Support for rule preventing routine venting and flaring of oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

Thank you for considering this important step to reduce emissions in Louisiana.

I moved to Louisiana after Hurricane Katrina to help with rebuilding, and my family lived there for years. The natural and cultural beauty of the state keeps it in my heart for good, though I live in Virginia now. I especially loved the fragile wetlands at the coast. When I arrived in 2006, devastating natural disasters were not the norm; and it was my first experience of seeing how widespread the societal damage of such an event could be.

This rule seems to be a valuable step in decreasing methane emissions which lead to such storms; as well as providing the immediate benefits of reducing toxins in the air and providing revenue for the people of the state. I think of all the folks I met in New Orleans, Phoenix and Buras in Plaquemines Parish, and Dulac while helping rebuild. I would hope that curbing the practice of routine venting and flaring would pose little economic hardship to the community, and instead greatly improve the quality of life of local people, both in the short and the long-term.

Thank you again for considering this rule as a protection of the irreplaceable beauty of your state.

Elaine Shank

Carrie Wiebelt

From: lbsimoneaux <lbsimoneaux@gmail.com>
Sent: Sunday, August 20, 2023 12:48 PM
To: Carrie Wiebelt
Subject: Flaring and Idle Wells in Louisisana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wiebelt—

I am writing to you to express my support in favor of the proposed rule to limit flaring and for well operators to manage idle wells.

It is past time for the Oil and Gas and Chemical Industries to be a good neighbor and cleaning up their trash. Idle, leaking wells and the flaring of natural gas and other chemicals are a waste of natural resources adding to greenhouse gasses and a detriment to the health of Louisianians who live near these flares and idle wells. Paying a \$250 fine is not disincentive enough for multi-BILLION dollar corporations. For too long, Louisiana has had a laissez-faire attitude regarding the Oil and Gas and Chemical Industries and their toxic waste and leaking infrastructure littering our coastline, swamps, and lands. It is time for them to clean up after themselves and possibly effect change in our environment.

In order to protect our beautiful state, we must all LEAVE NO TRACE! That goes for industry, too!

I support changes in the rules regarding flaring and idle wells.

Regards,

Laverne Simoneaux
248 Richland Avenue
Baton Rouge, Louisiana 70806

Carrie Wiebelt

From: Barbara Kaplinsky <kaplinskyb@gmail.com>
Sent: Sunday, August 20, 2023 12:57 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Reduce Toxic Air Pollution!!

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms Wiebelt,

The State should stop allowing methane gas to be burned by oil wells through routing venting and flaring. There must be limitations because it is one of the leading causes of climate change!!

Do we care about reducing toxic air pollution? Absolutely!

I see this rule as an excellent strategy to increase State revenue, by preventing the waste through burning of over \$16 million in methane gas per year. And also, it will strengthen the rule to make sure the "economic hardship" exception is not used as a loophole.

So, thank you to the Louisiana Department of Natural Resources for issuing a draft rule which would end the practice of routine venting and flaring for many oil wells throughout Louisiana. PLEASE adopt the rule as final.

Barbara Kaplinsky
Past President, National Council of Jewish Women, Greater New Orleans
309 Opal Street, 2E, New Orleans, LA 70124; (504) 982.6259

Barbara

Barbara Kaplinsky
504.982.6259

Carrie Wiebelt

From: Elizabeth Warner <ewarner10@gmail.com>
Sent: Sunday, August 20, 2023 2:34 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Public Comment on Venting and Flaring of Oil Wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To Whom It May Concern,

I am a resident of Baton Rouge and grew up in Sulphur, Louisiana. This state is my home and I want the best for all Louisianians.

I am writing to express my support for a proposed rule currently being considered by the Department of Natural Resources that would limit routine flaring and venting of oil wells.

Louisiana stands to lose the most from climate change: large portions of the state sit at or below sea level and we are vulnerable to hurricanes. Yet, our leaders and the petrochemical industry seem utterly opposed to any sort of efforts to protect our state from the long term effects of carbon emissions.

This proposed rule is a good step in the right direction. We should not squander our chances at long term prosperity and quality of life for future residents simply so the oil industry can take in greater profits. The role of government is to protect the long term prosperity for all Louisianians. Please do your job and help lead this state towards a sustainable future.

Thank you for your time,
Elizabeth Warner
741 South Foster Drive
Baton Rouge, Louisiana 70809

Sent from my iPhone

Carrie Wiebelt

From: Gilda Reed <gildareed@gmail.com>
Sent: Sunday, August 20, 2023 2:56 PM
To: Carrie Wiebelt
Subject: End oil well venting and flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Carrie,
I am much in favor of ending oil well venting and flaring in Louisiana. Less methane gas emissions mean better air quality and less adverse impact of climate change.
Thank you,
Gilda Reed

--
Gilda Werner Reed, Ph.D.
Department of Psychology
University of New Orleans
New Orleans, LA 70148

Carrie Wiebelt

From: jarmstrongwcr@gmail.com
Sent: Sunday, August 20, 2023 3:04 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Madams and Sirs:

Please do not allow the continued venting and flaring of the dangerous greenhouse gas, methane, from oil and gas wells in our state.

Thank you for your attention and consideration of this important matter.

Sincerely,

Johnny Armstrong
Ruston

Cell: 318-245-1471
Zip: 71270

Sent from my iPhone

Carrie Wiebelt

From: Martha Holmgren <marthaholmgren@icloud.com>
Sent: Sunday, August 20, 2023 3:14 PM
To: Carrie Wiebelt; Together Louisiana
Subject: stop routine venting flaring of oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hello,

It could have been very different for Louisiana. Years ago, we could have said, "So, you want to extract and develop the incredible natural resources we have here. OK, but you will be required to keep our air and water and soil clean and you will be required to pay taxes so that the communities impacted by your profit-gaining work can have the schools and parks and libraries they need." But instead, Louisiana bowed down, begging, and allowed the companies to call the shots - allowed them to abuse the land and the health of the people of the state.

Perhaps a few small measures could still be taken, like limiting routine venting and flaring of methane at oil wells. This will reduce toxic air pollution - research proves that brain development of children is very negatively impacted by exposure to the toxins, handicapping them in their growth as much as if they were made to attend low performing schools. Also, the children might like to play outside in the summer, ride bikes and swing at the park, but with climate change increased by these methane gas emissions, and day after day of 100+ degree temperatures due to climate change, how is that possible? The state will gain income by limiting these flares, and some of that could be used to build better parks, schools, and community pools for the children and families of Louisiana.

But this will not just benefit Louisiana. The terrible air we create flows around the planet, adding to the reputation Louisiana has of being a filthy, selfish, and uncaring state.

Please do not just create more loopholes that in the end allow oil companies to roll up the windows of their fancy cars and drive away, unchanged.

Thank you.

Martha Holmgren

Carrie Wiebelt

From: Dierdra Lopinto <dierdra.lopinto@gmail.com>
Sent: Sunday, August 20, 2023 3:37 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: End Practice of Routine Venting of LA. oil wells.

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Carrie Wiebelt
LDNR Office of Conservation

Dear Carrie Wiebelt,

I want for my community and Louisiana to have a reduction of toxic air pollution from the burning of waste methane at oil wells throughout the state.

To me, this is also an economic issue that our state revenue could be increased by \$16 million .

Also, I would like some reassurance that the term "economic hardship" not be used by companies as a loophole.

Dierdra Lopinto resident of Jefferson Parish , Louisiana

Carrie Wiebelt

From: Emily Flagler <emily@eflaglerarchitect.com>
Sent: Sunday, August 20, 2023 3:46 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Eliminating Venting of Methane from Oil Wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To Whom It May Concern,

I am a Louisiana citizen, with serious concerns over the immense methane emissions coming from oil wells, both from venting and from leaking. Methane venting releases significant amounts of methane into the atmosphere (40,000 tons of methane in 2019 alone).

I ask that the Louisiana Department of Natural Resources enact legislation for strong regulations that eliminate all venting (regardless of "economic hardship" which would easily become a loophole) and force gas and oil companies to route all emissions to a nearby sales line, as is recommended by the EPA in their 2022 report. If a nearby sales line is not available, the company should be required to either 1) use the gas for power on-site for another useful purpose or 2) route it to a flare control device that reduces flare methane emissions by 95% (also recommended by the EPA in the above mentioned report).

A copy of the report can be found here:



EPA's Proposal to Reduce Climate- and Health-Harming
Pollution from the Oil and Natural Gas Industry Overview

Download EPA's proposal to reduce climate- and health-harming
pollution from the oil and natural gas industry. The proposal
includes a range of measures to reduce methane emissions, as well as
other measures to improve air quality and protect public health.

- EPA's proposal would reduce climate and health benefits for all Americans by lowering greenhouse gas emissions and protecting public health by reducing air pollution and gas flaring emissions and flaring emissions are already used to monitor or eliminate the harmful pollutants.
- The oil and natural gas industry is the nation's largest industrial source of methane, a highly potent climate pollutant that is responsible for approximately one-third of current warming from human activities.
- EPA's proposal would address a range of climate and health impacts, including various organic compounds that contribute to ground-level ozone (smog) and air toxics such as benzene that are emitted along with methane and that affect the health of people and communities who live and work near oil and gas facilities.
- The proposal solicits comments and information from a diverse range of parties, including state and local governments, tribal nations, communities affected by oil and gas facilities, environmental and public health organizations, and representatives of the oil and natural gas industry.
- EPA intends to issue a final rule in 2024 and is requesting comments and information to help the Agency evaluate options that reduce methane emissions, including the potential for methane emissions not covered by the proposal.
- After taking public feedback into account, EPA intends to finalize requirements for new and existing oil and natural gas sources that are strong, enforceable, and ambitious, and that are anchored in science and the law. The Agency plans to issue a final rule before the end of 2024.

EPA's Proposed Non-Source Performance Standards and Emissions Guidelines for Oil and Gas Facilities

- Require states to reduce methane emissions from hundreds of thousands of existing sources, nationwide, for the first time.

1

**2021-oil-and-gas-proposal-
overview-fact-sheet**

PDF Document · 233 KB

Thank you,
Emily Flagler

Carrie Wiebelt

From: Julie Nice <jnicenola@gmail.com>
Sent: Sunday, August 20, 2023 4:09 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Importance of protecting air quality in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I hope you will do everything within your authority to protect and improve the quality of the air in the state of Louisiana.

Unregulated flares of methane gas would be extremely detrimental to the health of not only our state's citizens near the plants producing methane, but to the health of everyone. We have the scientific knowledge to improve air quality in our communities, our state, the country, and the entire world. We must take action now and in the future to do this consistently in order to safeguard the health of people and animals.

Why can't Louisiana be a leader in demonstrating how to improve air quality, starting now? We should be following the advice of independent scientists to accomplish this important outcome as soon as we can, rather than letting politicians and petrochemical companies dictate our policies regarding our precious environment.

Sincerely yours,

Julianne Nice
1930 General Pershing Street
New Orleans, LA 70115

--

Julianne Nice
JN Consulting Group
PH: 504.810.1759
jnicenola@gmail.com

Carrie Wiebelt

From: earl pratz <ehpratz@att.net>
Sent: Sunday, August 20, 2023 4:16 PM
To: Carrie Wiebelt
Subject: Comments for "Venting and Flaring of Natural Gas (LAC 43:XIX.103, 3503, 3507, 3509, 3511)"

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

My comments are directed toward four statements and a missing controlling rule.

103A.3.a - If the operator underestimates gas production and then applies for 103A.3.b.ii flaring I feel is a loophole. There should not be a flare option but the well should be required to operate under either of b.i or b.iii.

3507 B - 1. "Economic hardship" definition and 2. "Point of delivery" definition.

I feel that to declare "economic hardship" would indicate that the gas was not worth reducing so shut in the well.

Specifically define "point of delivery" so that there is a uniform location identified for that delivery. This will reduce hedging about "economic hardship".

3507 C. Does this leave a loophole for fully vertical wells to vent?

3509 A.3 A reasonable length of time needs to be attached to the operations where flaring is permitted.

Missing control. There does not seem to be any concern given to natural gas seeping. There should at least define seeping with advice for control.

Earl

Carrie Wiebelt

From: Maud Walsh <maudwalsh@gmail.com>
Sent: Sunday, August 20, 2023 4:21 PM
To: Carrie Wiebelt
Subject: support for LDNS draft rule to end routine oil well venting and flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I am writing in strong support of the Louisiana Department of Natural Resources draft rule to end the practice of routine venting and flaring for many oil wells throughout Louisiana. I believe this is a good idea for many reasons. It would reduce emissions of methane, a powerful greenhouse gas and carbon dioxide, also a greenhouse gas. As you are probably aware, studies recently found that more methane is emitted than previously assumed <https://www.npr.org/2022/09/29/1125894105/oil-field-flaring-methane-report> In addition to contributing to air pollution by methane, carbon dioxide, and volatile organic compounds, the intentional release of natural gas is wasting an energy source and reducing revenue for Louisiana.

Thank you for considering my comments.

Sincerely,

Maud Walsh

7113 Joliet Avenue

Baton Rouge, LA 70806

Carrie Wiebelt

From: Janetlippking <janetlippking@gmail.com>
Sent: Sunday, August 20, 2023 5:07 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Venting methane gas law

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please pass law that companies cannot burn/vent methane gas in LA which polutes the environment and increases emissions to increase climate change. Close any loophole that the corporations can wiesel out of following the law.
Thanks

Sent from my iPhone

Carrie Wiebelt

From: Katie Wood <katie@westsidesponsoring.com>
Sent: Sunday, August 20, 2023 6:27 PM
To: Carrie Wiebelt; Together Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I am writing regarding the rule to end the practice of routine venting and flaring for oil wells in Louisiana. As a citizen who is interested in conservation work, I would like to urge that this practice be stopped. Everyone is aware of the record breaking heat the state has experienced for several weeks now. Climate change is a global threat, however, if everyone does their part, it can be helped. Not only would this new rule exponentially reduce gas emissions, but state revenue will also increase. With the challenges of economic hardships tacked on top of climate crisis, kindly stop the flaring and venting of oil wells.

Best regards,
Katie Wood

Carrie Wiebelt

From: christine aragon <shichi46@gmail.com>
Sent: Sunday, August 20, 2023 7:23 PM
To: Carrie Wiebelt
Subject: Draft rule

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Policy makers you know what the right thing to do is - to stop the routine releases and burning of waste methane at oil wells. Look at your children and grand and tell them I could have helped to keep the air you breathe clean but I didn't because?????

Wake up

Carrie Wiebelt

From: Gayle Joseph <gaylejoseph@att.net>
Sent: Sunday, August 20, 2023 7:56 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Controlling methane release

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am writing to support to rule being proposed to restrict the release and burning of waste methane at oil wells. For the well-being of our citizens and our State, it is a long overdue step to take in the right direction.

Please adopt and enforce this rule.

Gayle Joseph

Baton Rouge

Sent from my iPhone

Carrie Wiebelt

From: Stephen Mosgrove <sgpmosgrove@gmail.com>
Sent: Sunday, August 20, 2023 8:44 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Ms. Wiebelt,

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I'd like to express my support for full execution of LDNR's proposed rule to restrict the venting and flaring for many oil wells in our state.

We must make Louisiana cleaner, environmentally safer, and do our part against climate change. Our people have been abused by industry for too long. It's no wonder our best and brightest continue to leave.

Thank you for the proposal, and I hope that LDNR fully adopts this proposed rule.

Sincerely,

Stephen Mosgrove
New Orleans Native and Still Resident

Carrie Wiebelt

From: Cindy Wilkinson <cindy4hair@icloud.com>
Sent: Sunday, August 20, 2023 8:55 PM
To: Carrie Wiebelt
Subject: Stop burning of methane via oil wells.

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Carrie Wiebelt
Office of Conservation

Dear C Wiebelt;

Please adopt the RULE to end the practice burning of methane via flaring and venting.

The burning of methane contributes to global warming because of methane emissions.
It also contributes to air pollution.

Also, PLEASE DO NOT allow the exception for economic hardship. This would easily become a loophole! Strengthen the Rule so there is NO loophole.

Please help Louisiana move into the 21st century by enacting this Rule without the exception. It would help reduce dangerous air pollution and by doing so it would improve the air quality for all Louisiana citizens.

I've read that the Rule will help increase State Revenue by not wasting by burning methane.

Thank you for your consideration of the Rule.

Louisiana and Jefferson Parish Citizen,

Cynthia Wilkinson
1808 Division
Metairie LA 70001

Carrie Wiebelt

From: Diane Casteel <999diane@gmail.com>
Sent: Sunday, August 20, 2023 10:02 PM
To: Carrie Wiebelt
Subject: End the practice of routine venting and flaring of oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

The time has long passed when burning methane for the convenience of the oil companies can be tolerated. Our air quality, indeed the health of planet Earth is at stake. I implore the LDNR to put an end to the practice.

Sincerely,

Diane Casteel

71620 Leveson St, Abita Springs, LA 70420

Carrie Wiebelt

From: julietmeeks@gmail.com
Sent: Sunday, August 20, 2023 11:22 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Stop venting and flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hello,

My name is Juliet O'Keefe and I am a resident of Louisiana. I would like to submit a public comment to express support of the new rule to prohibit venting and flaring of methane gas. This is important to me because this procedure is harmful to the residents and environment of Louisiana. I want to grow my family here, and enforcing this rule will make Louisiana a safer place to live long term.

Please put this rule in place for the sake of all residents of Louisiana.

Thank you,
Juliet

Carrie Wiebelt

From: Becky B <roquinn222@gmail.com>
Sent: Sunday, August 20, 2023 11:26 PM
To: Carrie Wiebelt
Subject: Proposal on ending routine venting and flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi. I would like to support the draft to end the practice of routine venting and flaring of oil wells in La. LA needs to stop letting methane gas burn in this fashion. Stopping this would reduce air pollution and help with climate change. If you have not noticed with our over 100 degree temps, weather disasters we need to start addressing climate change. Its hot as hell. Burning methane is responsible for 25% of global warming. Not burning the methane gas in this way would increase revenue for the State too.

Look around we really need to start taking care of "Mother Earth." She's pissed off. Lol
Have a good day,
Rebecca Bohm

Carrie Wiebelt

From: Kristen Luchsinger <kluchsinger@mac.com>
Sent: Monday, August 21, 2023 12:56 AM
To: Carrie Wiebelt
Subject: Protect the environment

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please vote to stop allowing methane to be vented into our air space. We need to focus on cleaning up the waste that we are polluting our beautiful city! Clean up cancer alley!

Thank you,
K Luchsinger

Carrie Wiebelt

From: Robert Desmarais Sullivan <chezdesmarais@gmail.com>
Sent: Monday, August 21, 2023 5:57 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wiebelt,

As an 80-year-old Louisiana Creole with 300 years of family history in this beloved State, I have been appalled for an entire lifetime by the subservience of State government to the powers in the fossil-fuel industry. We were once proud of being a hunter's paradise, and now hunters fear environmental toxins when they venture out into their old grounds.

Methane flaring provided free heat to my grandparents in Cameron Parish when I was a child, but now nobody in my family lives in Cameron Parish because they fear the effects of sea-level rise, hurricanes and pollution.

It is time to stop flaring, and actually it is time to stop our dependence on the fossil-fuel industry.

From this summer's experiences, I hope we have time to stop before climate change kills us all.

ROBERT DESMARAIS SULLIVAN
Lake Charles and New Orleans
757.642.8607



3401 Canal Street, New Orleans, LA 70119
contact@togetherla.org
TOGETHERLA.ORG

August 21, 2023

Ms. Carrie Wiebelt
Louisiana Department of Natural Resources
Office of Conservation
Engineering Administrative Division

Via Email at carrie.wiebelt@la.gov

Re: Comments on Venting and Flaring of Natural Gas

Dear Ms. Wiebelt,

Together Louisiana supports the Office of Conservation's proposed amendments to its rules that would limit the wasteful practice of routine flaring and venting as an improvement over the status quo. As a broad-based organization of over 200 congregations and civic organizations from across Louisiana, we believe in solutions that benefit a broad and diverse group of people, and this proposed amendment does that.

Methane waste from venting and flaring at oil and gas production sites constitutes energy waste, results in lost revenue to state and local governments and mineral owners, exacerbates climate change, and adversely affects the health and safety of communities across Louisiana.

The practice of venting and flaring of natural gas produced at oil wells is a wasteful practice that can be avoided or minimized with cost-effective solutions. In 2019 alone, operators in Louisiana vented and flared over 5.2 billion cubic feet of natural gas, worth nearly \$16 million. When operators vent or flare natural gas, they waste an energy resource that could be captured and put to productive use. Additionally, when gas is wasted, individuals and state and local governments lose out on revenue from royalties and taxes. Methane, the primary component of natural gas, is also a powerful climate pollutant, more than 80 times as powerful as carbon dioxide in the near term. Venting releases methane directly into the atmosphere and flaring emits methane, with amounts depending on how well -- or whether -- a flare is operating. Finally, venting and flaring releases other harmful pollution to the atmosphere, including toxic air pollutants, volatile organic compounds and oxides of nitrogen that contribute to ozone pollution, or smog. For these reasons, it is critical that oil and gas operators in Louisiana stop this wasteful and polluting practice.

Conservation's proposed amendments are a step in the right direction to begin addressing the problem of methane waste in Louisiana. Conservation proposes gas management planning requirements for new wells, a prohibition on routine flaring for certain wells, commonsense



reforms to the existing economic hardship exception, additional reporting requirements for vented and flared gas, and the removal of an exemption for horizontally drilled wells. These proposed amendments are significant improvements to Conservation's current rules that should reduce methane waste if properly implemented.

We would like to lift up one important point as it pertains to the proposed amendment to the rule, specifically the economic hardship applications. As Conservation proceeds with this rulemaking and moves to implementation, we encourage it to set clear guidance and expectations for how economic hardship applications will be reviewed by District Office Managers and what factors will be considered in whether they should be granted. Additionally, Conservation should ensure that the public has access to information about how many applications to flare under the economic hardship test are granted and why. Finally, regarding proposed §103.A.3.ii., operators of new wells are in a particularly good position to capture and either sell, use, or store produced natural gas since such operators are in complete control of where and when to drill new wells and thus can ensure adequate takeaway capacity for the gas and we urge Conservation to deny economic hardship applications from such operators.

Together Louisiana is grateful that Conservation is taking a critical step toward the more responsible use of natural resources in our state. We support common sense rules that address routine flaring and venting in Louisiana's oil and gas sector to limit the waste of valuable natural gas resources. We should come together in both belief and action to protect the precious resource of energy, our economy, and our environment. We strongly encourage Conservation to efficiently finalize these rules, as there is no time to waste.

Sincerely,

Edgar Cage, Together Louisiana

Ben Nugent-Peterson, Central Louisiana Interfaith

Erik Hancock, Together New Orleans

Carrie Wiebelt

From: Charles Frost <gcharmoni@gmail.com>
Sent: Monday, August 21, 2023 7:36 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: An End to Routine Venting and Flaring of Many Oil Wells in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I recently learned that the Louisiana Department of Natural Resources (LDNR) has issued a draft rule to end the practice of routine venting and flaring of idle or abandoned oil wells which release significant amounts of methane, a powerful greenhouse gas, into our environment. This is a big step in the right direction toward not only increasing state revenue through prevention of loss of over \$16 million in gas per year, but also significantly preventing the release of methane into our air yielding cleaner air to breathe and reducing a major cause of climate change.

I urge you to work to make this draft rule a reality and make Louisiana a place with a safe and clean environment.

Sincerely,

Charles Frost
1204 North 5th Street
Monroe, Louisiana 71201
gcharmoni@gmail.com

--
Charles Frost
gcharmoni@gmail.com

Carrie Wiebelt

From: King Rowe <king.rowe.7@icloud.com>
Sent: Monday, August 21, 2023 7:53 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Reduce methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Greetings,

Reduce methane emissions in the air because it's polluting the air for us our children and our grandchildren. Our grandchildren deserve the right to breathe fresh air in the future after we're gone. I'm speaking on their behalf and I thank you in advance for considering the cause this has on the environment and the future leaders of our great State of Louisiana. Let's work together in this 21st century to reduce methane emissions; there must be a better way we can come up with, by now.

Thank you again for your support and cooperation in this great matter of breathing Fresh Air.

Carrie Wiebelt

From: Nanette Bahlinger <nbahlinger@yahoo.com>
Sent: Monday, August 21, 2023 7:59 AM
To: Carrie Wiebelt
Subject: Please cut methane emissions in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Good morning, Ms. Wiebelt,

Regarding the proposed rule to end the practice of routine venting and flaring for many oil wells throughout Louisiana, I offer my support.

Among its many benefits, the rule will reduce toxic pollution (vital for the good health of Louisianans), increase State revenue (vital for the proper management of our unique and beautiful State), and help reduce methane gas emissions (one of the leading causes of climate change, of which we are all feeling the effects during this unprecedented heat wave).

This sensible rule will bring Louisiana into the 21st century. I support it and also support strengthening the rule to make sure the "economic hardship" exception is not used as a loophole.

Thank you for your time,

Nanette Bahlinger
5323 Blair Lane, Unit L-1
BRLA 70809

Carrie Wiebelt

From: John Ross <jross@posigen.com>
Sent: Monday, August 21, 2023 8:06 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Would you live next to a plant that flares methane?

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hello Carrie,

I know that Louisiana relies on fossil fuels economically as does the rest of the United States for what passes through our borders. I am most concerned having moved back here about the quality of the air we breath.

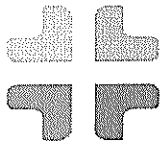
These must be limits for these companies as all other types of companies are regulated. They also must be held accountable when they violate these limits or don't follow the regulations they have agreed to.

Can you help reduce toxic air pollution? We should be making more income off of these incredibly profitable companies. They are key partners in our Energy Transition and don't suffer from any "economic hardship".

Thank you for reading and listening.

J.R.

--



John D. Ross, Jr. | Vice President Marketing
(203)722-9655
PosiGen Solar and Energy Efficiency www.posigen.com

[Find out more about our #SolarForAll Initiatives](#)

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Carrie Wiebelt

From: Jill RQ <jill.rauh@gmail.com>
Sent: Monday, August 21, 2023 8:56 AM
To: Carrie Wiebelt
Subject: Stop methane gas burning by oil wells through routine venting and flaring!

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I am writing to urge LDNR to adopt as final the rule to end the practice of routine venting and flaring by oil wells. This is important for the protection of all life, including those most vulnerable. Methane gas burning causes toxic air pollution that harms people and nature. Right now there are no limitations on routine venting and flaring. This will also safeguard the health and safety of future generations, including those not yet born, and will increase state tax revenue to benefit the needs of people now and in the future.

Thank you,
Jill Rauh Quereshi

Carrie Wiebelt

From: Nell Hahn <nellhahn2@gmail.com>
Sent: Monday, August 21, 2023 9:24 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Adopt rule restricting flaring of methane

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I am writing to urge you to adopt the proposed rule restricting flaring of methane gas. This flaring is wasteful and contributes to the catastrophic warming of the earth. Please take this modest step to reduce our carbon emissions.

Nell (Ellen) Hahn
2223 W. St Mary Blvd.
Lafayette, LA 70506

Carrie Wiebelt

From: Melvin Mitchell Sr <mitch.mitchell999@gmail.com>
Sent: Monday, August 21, 2023 9:33 AM
To: Carrie Wiebelt; Edgar Cage
Subject: Reducing Methane Emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

I strongly oppose venting and flaring of methane at oil wells. Please halt state approval of this practice immediately. We need to reduce the level of Toxic Air Pollution in our state, which has some of the highest levels of pollution in the nation. Methane emissions cause air pollution. We must save our air. We now have record heat in the state of Louisiana. Hurricanes in California, increased occurrences of unsafe/unbreathable air nation-wide and record drought everywhere.

Please stop. Continued practices of deliberate air pollution (/deliberate methane emission) must end now.

Respectfully,

Melvin Mitchell Sr.

Carrie Wiebelt

From: Peter Digre <peterdigre@gmail.com>
Sent: Monday, August 21, 2023 9:42 AM
To: Carrie Wiebelt
Cc: contract@togetherla.org; Gregory Manning; gnoicc@groups.io
Subject: GNOICC Wants Methane Burning and Flaring to Stop Now

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt:

I am the Founder and Chair of the Greater New Orleans Interfaith Climate Coalition. We strive to increase environmental justice and to mitigate climate change. We know that methane has a heat trapping capacity 82.5 times greater than carbon dioxide and, as such, is an exceptionally powerful greenhouse gas which traps the sun's heat and leaves us sweltering while increasing the power of hurricanes, unleashing rain bombs, drying out the earth's vital agricultural lands, destroying our State with sea level rise, and much more. All of the above has a tragic and disproportionate impact on the poor of our State who suffer the worst consequences of climate change.

Therefore, the GNOICC asks for the immediate adoption of rules to stop the flaring and venting of methane. If we do not act now, we are furthering the destruction of the earth, our home. It is shocking that there are no controls over venting and flaring at oil wells and it is time for this practice to end. To suggest that such rules should be waived due to economic hardship is inappropriate since the owners of oil wells are clearly responsible for protecting us from the damage that they are doing.

Please contract me and tell me what additional actions the GNOICC should take to advance the adoption of rules to stop flaring and venting. We would be delighted to discuss this with you at an upcoming GNOICC General Assembly meeting.

Thank you for your efforts to protect our earth.

Pastor Gregory Manning
Founder and Chair
Greater New Orleans Interfaith Climate Coalition
gmanning1973@yahoo.com
Peter Digre
Secretary, GNOICC
peterdigre@gmail.com

Carrie Wiebelt

From: Casandra Corrales <casandra.corrales@gmail.com>
Sent: Monday, August 21, 2023 9:52 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Public comment to cut methane emissions in LA

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please please please. Not only does our world and mother nature need this but we as a human species do! Right now there are virtually no limitations on routine venting and flaring of methane at oil wells. This rule will reduce toxic air pollution and why that's important!! The rule will help reduce methane gas emissions, which is one of the leading causes of climate change. The rule would INCREASE state revenue, by preventing the waste through burning of over \$16 million in methane gas per year. (That's enough gas to fuel every household in Baton Rouge for over a year and a half!). If anything, strengthen the rule to make sure the "economic hardship" exception is not used as a loophole.

Please help us be better!
Casandra Corrales-Brupbacher
Director / Producer / Actress
Website: www.sidecfilms.com
Cosmetologist
IG: @quirky_honest

Carrie Wiebelt

From: Daisy Slan <dslan01@gmail.com>
Sent: Monday, August 21, 2023 10:06 AM
To: Carrie Wiebelt; Together Louisiana
Subject: Rule to end the Practice of Routine Venting and Flaring in Oil Wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Thank you for working to possibly end the practice of routine venting and flaring in oil wells. It is a fact that there are no limitations on routine venting and flaring of methane at oil wells.

The rule will reduce toxic air pollution but most importantly it will help with the climate change issues we are living with today. We have allowed the decisions we made in the past to paralyze us today.

The rule will help to reduce methane gas emission which is one of the leading causes of climate exchange. Please strengthen the rule to ensure the economic hardship exception is not used as a loophole.

Thank you for your time and attention to the request.

Carrie Wiebelt

From: Sissy Wiggin <sissywiggin@gmail.com>
Sent: Monday, August 21, 2023 10:16 AM
To: Carrie Wiebelt
Subject: Cutting methane emissions

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

In 1969 and 1970 I was part of a small group of young environmentalists in Donaldsonville named Youth for Conservation. Due to our passion for the environment and the massive amount of work we did, we were named Louisiana youth conservationists of the year by the LA Wildlife Federation and we were photographed by Life Magazine.

That was when I was a teenager. I am now 68 years old and still fighting the same battles - and things haven't improved much in our state. Both of my children got out of Louisiana as soon as they could find good jobs elsewhere - and a major part of their decision was our state's horrible environmental track record.

And one of those environmental nightmares is methane gas emissions. I do not understand why there are so few limitations on routine venting and flaring of methane at oil wells. We need to reduce methane gas emissions which is one of the big causes of climate change.

I have been reading about this important topic that will soon come up for a decision and am so upset that I am still writing the same kind of letters that I wrote 50 years ago. When will we ever learn the importance of our environment here in this beautiful state? We are one of the richest states in the country in terms of natural resources - so why is it that we are 49th or 50th in EVERY single quality of life issue? My friends always ask me if I have begged my grown children to move back - and I ALWAYS say, I am begging them not to until things change here.

I want the "economic hardship" exception to not become a huge loophole. Please strengthen the rule.

It amazes me that so few people understand the tragedy that we are such a rich in resources state and the main people truly benefiting financially are big corporations.

I strongly request - beg - that LDNR end the practice of routine venting and flaring for many oil wells throughout LA.

Thank you.

Sincerely,
Jean Wiggin
71599 Leveson St.
Abita Springs, LA

Carrie Wiebelt

From: MiJa Thompson <mija5247@gmail.com>
Sent: Monday, August 21, 2023 10:19 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Reducing Toxic Air Pollution!!

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Good morning;

I am a tax-paying resident of Louisiana.

My statement is in support of the Louisiana Department of Natural Resources (LDNR) draft rule about ending routine venting and flaring of methane at oil wells throughout Louisiana, and in addition, strengthening the rule to eliminate the chance of abusing the exception around "economic hardship".

As we increasingly become aware of the effects of pollution on our environment we need to be more diligent about ways to protect the environment and ourselves, the people. The future struggles for my and all our children around the realities of climate change and global warming saddens and concerns me greatly. As I understand there are virtually no rules limiting the venting and flaring of methane at oil wells in Louisiana. This is so irresponsible considering that methane is one of the leading causes of climate change. I also understand that this rule would increase state revenue by preventing waste with burning of this methane gas! We need this revenue!!

Let us do better for our future and that of our children. I think this rule is a step in the right direction.

Thank you,

MiJa Thompson,
2155 Christian St,
Baton Rouge, LA 70808.

Public comment on Louisiana's draft rule
"Venting and Flaring of Natural Gas"

August 21, 2023

by Jay Hakes

Author of *Energy Crises: Nixon, Ford, Carter, and Hard Choices in the 1970s*

My name is Jay Hakes. I reside in New Orleans (across the street from two of my grandchildren).

I have a long record working on energy analysis, policy, and history. Over my career, I have served as Assistant to the Secretary of Interior, Administrator of the U.S. Energy Information Administration, and Director of Research and Policy for the National Commission on the BP Deepwater Horizon Oil Spill and Offshore Drilling. I have also written numerous articles and two books on U.S. energy and environmental policy. My third book, with the working title "Professors, Presidents, and the Planet," is scheduled for release next year. I have been invited on twenty-seven occasions to testify before congressional committees.

I would like to congratulate the Department of Natural Resources for moving to restrict the venting and flaring of natural in our state. This action is long overdue. The new rule will provide many benefits for Louisiana, the nation, and the world – for us, our children, and generations to come.

I support the overall thrust of this rule because:

1. Flaring of natural gas emits carbon dioxide, while venting releases methane directly into the air. Wells that employ either method of disposal create health risks for nearby populations and contribute to a warming of the planet that has begun to alter the climate as we've known it. National and state policies have long adopted the principle that no one has the right to pollute without any constraints or penalties. In common parlance, you can't just dump your garbage in your neighbor's yard or the nearest river. Similarly, companies producing oil and gas should not release substantial pollution into the atmosphere and leave those suffering adverse effects to fend for themselves.

2. Global warming has a particularly adverse effect on Louisiana because it contributes to the loss of coastal land. The state will continue to ask for massive federal expenditures to help protect its coast. The case for such assistance will weaken if the state does little to reduce greenhouse gas emissions. Because of the very visible harms of global warming here, we should be a leader in slowing climate change.
3. The draft rule is generally consistent with Louisiana's climate action plan. The plan is multi-faceted, and, in some respects, the whole is greater than the sum of its parts. It is easier to win support for its individual measures when they are part of a balanced package. The failure to put tight controls on these emissions would be a severe blow to the overall plan.
4. Fugitive methane has value when used as a fuel. It is an unnecessary waste of resources to just release it into the atmosphere. Thus, venting and flaring waste a precious resource that is difficult to justify. The role of conservation is to reduce unnecessary waste.
5. The value of the resource makes restricting venting and flaring a particularly cost-effective way to protect the environment. Sharply reducing these gases will have economic benefits for all concerned, even without including the costs of climate change in the calculations. States like Texas, Oklahoma, and Louisiana have extensive gas pipelines that make it easier to utilize methane as a fuel rather than a waste product. So, the argument "it's just too expensive" carries less weight here than it would in the Dakotas.
6. Protecting the environment is good for Louisiana residents and industries. A weakening of the draft rule would hurt efforts by the natural gas industry to position itself as a "clean" alternative to coal. Moreover, there is already evidence that the state's "all-of-the-above" approach to cleaning up its dirty legacy oil and gas infrastructure is helping Louisiana attract federal funding and private-sector energy investments. (See, for instance, James Osborne, "While Texas Balks, Louisiana Pursues Clean Energy Projects," *Houston Chronicle*, May 18, 2023.)

As someone who spent seven months studying the BP oil spill, I fully support exemptions based on safety considerations. However, the case for special treatment based on "economic hardship" is weak. I have spent years studying the creation of energy, environmental, and conservation policies in the United States. Drawing on this experience, I would oppose such special treatment for the following reasons:

1. The argument that some companies will suffer irreparable harm has been made with virtually every new environmental policy for over half a century. In most cases, these claims have been greatly exaggerated. Even if a few businesses cannot comply, it still makes sense to have a common standard. Good conservation policy should create level playing fields where private companies can fairly compete. Such rules do not need to guarantee that everyone is a "winner" everywhere, all the time.

2. Requiring judgments (with facts in dispute) about “economic harm” will make the rule more complex and likely lead to implementation delays. Improved technology allows us to measure physical emissions; “economic harm” is more subjective, and savvy consultants can probably “prove” any side of the argument. It will be very challenging for the department to construct a clear “economic harm” standard that would avoid frequent litigation.
3. Unless I am missing something, it appears that the department intends to change the calculations of “economic hardship” basis on the market price of natural gas. Natural gas is one of our most volatile commodities. Prices shift significantly in relatively short periods of time. Does that mean the standard for economic hardship will be revised with each daily change in the market value of natural gas? This fluidity would not be in the interest of the industry or the public. (This problem might be somewhat fixable if the price of natural gas is based on, say, a two-year average revised annually.)
4. The beneficial effects of the overall rule will be multiplied if it moves us toward an international standard for dealing with fugitive methane. Impoverished nations that produce oil and gas can probably make a more substantial “economic hardship” case to justify high emissions than we can. Do we want to send a message to these countries that they are not obligated to reduce the release of fugitive methane?
5. In Louisiana, we have had a special opportunity to observe the effects of exemptions to pollution controls due to the “economic hardship” argument. Our state has been littered with orphan wells that pollute even when production has ceased. Fortunately, the federal government is stepping in to remediate the worst cases. But two questions remain. Why should the general taxpayer finance the cleanup rather than the company (and ultimately its customers) that created the pollution? Will the federal government pay for the future equivalents of orphan wells when the state had the opportunity to correct the problem in the first place?

In sum, I hope the Department of Natural Resources will adopt the draft rule but refrain from providing special treatment based on claims of “economic hardship.”

Thank you for considering my comments,

Jay Hakes

August 21, 2023

Carrie Wiebelt

From: Mel Manuel <melrekic@gmail.com>
Sent: Monday, August 21, 2023 11:06 AM
To: Carrie Wiebelt
Subject: Please stop venting and flaring of methane at oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Carrie,

Please put an end to the routine venting and flaring of methane gas at oil wells in our state. Burning methane gas is estimated to be responsible for up to 30% of climate warming since the 18th century and Louisiana consistently ranks in the top 10 worst states for air pollution. This is just common sense. Please choose our health over the profits of big corporations.

Many thanks in advance for your consideration.

Sincerely,
Mel Manuel

Carrie Wiebelt

From: Marcia Hardy <hardy62014@yahoo.com>
Sent: Monday, August 21, 2023 11:14 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Support for ending routine venting and flaring from oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Good morning. I support your efforts to end routine venting and flaring of oil wells. These activities produce air pollutants including methane. I would hope you make every effort to limit the potential for continuing this practice based on economic hardship. For far too long, humankind has justified various polluting practices based on economics. These practices have played into the climate change we're facing.

I'm doing my part to combat climate change. I've installed a high efficiency heat pump for my cooling and heating needs. I set my thermostat high in the summer and low in the winter. I've switched to LED lightbulbs. I combine errands to limit gasoline usage. I follow DEQ's advice on when/when not to operate mowing equipment. I've purchased a battery operated leaf blower and chain saw.

It's time for the oil and gas industry to do the same. The industry can afford taking sensible steps to combat climate.

Marcia Hardy, DVM, PhD
St. Gabriel, LA

Sent from my iPad

Carrie Wiebelt

From: Rebecca Tuggle <rebtug@gmail.com>
Sent: Monday, August 21, 2023 11:29 AM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Comment on proposed vent/flare of methane rule

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wiebelt,

I am pleased that a rule prohibiting routine venting and flare of methane at oil wells is being considered in Louisiana. As a registered nurse in this state I see first hand how toxic air pollution affects patients and families health. It is well documented how this same air pollution affects our climate. Adding to that the possibility of this rule increasing revenue for the state makes this a win for everyone.

While it may not be perfect, if this rule can deliver on decreasing toxic air pollution and improving the health of the residents of our state then I support it. Thank you for considering my comment.

Rebecca Tuggle
Shreveport, LA



Louisiana Budget Project

Aug. 21, 2023

Carrie Wiebelt
Department of Natural Resources
Office of Conservation, Environmental Division
617 North Third Street, Room 874-D
Baton Rouge, La 701802

Re: COMMENTS ON THE OFFICE OF CONSERVATION'S NOTICE OF INTENT TO
AMEND LAC 43:XIX, Subparts 1 and 15.

Dear Ms. Wiebelt and interested parties.

Louisiana Budget Project appreciates the opportunity to comment on the Department of Natural Resources Office of Conservation's proposal to restrict the routine venting and flaring of natural gas from wells and amend Louisiana Administrative Code 43:XIX, Subparts 1 and 15.

In 2019, Louisiana had approximately 31,000 actively producing oil and gas wells, which lost 27.2 billion cubic feet of methane gas, mostly from leaking. But nearly 20 percent or 5.2 billion cubic feet was wasted during routine flaring and venting, which translated to \$710,000 in lost severance tax revenue in 2019 alone, according to analysis by Environmental Defense Fund and Synapse. The proposed amendments should help recover much of this lost revenue. If finalized as proposed and effectively implemented, they will reduce natural gas and methane waste from Louisiana's production facilities, which will also increase severance tax and royalty revenues and reduce greenhouse gas emissions. Methane is responsible for at least 25 percent of current warming today.

These proposed amendments represent an improvement over the current rules, and we support them as important progress to tackle methane waste in Louisiana. Specifically, we support the proposed:

- **Requirements for gas capture planning at new wells.** Requiring operators to either certify 100 percent takeaway capacity or identify what they will do with produced gas makes common sense. However, we do not believe the compliance option of "evaluat[ing]" whether a well is a "candidate for flaring" under the economic hardship exception is necessary.
- **Addition of a prohibition on routine flaring.** DNR's current rules do not contain any prohibition on routine flaring, and this proposed addition is an important step toward reducing the unnecessary waste of natural resources in Louisiana. According to the EDF, the proposed prohibition on routine flaring will apply to about 94 percent of the natural gas produced from oil wells in the state. As discussed below, we encourage DNR to consider future revisions to the rules to expand the prohibition on routine flaring to more wells.
- **Removal of the existing exemption for horizontal wells.** The extension of the prohibition on venting to horizontal wells should significantly decrease methane

emissions since horizontally drilled wells account for more than 70 percent of newly permitted wells, according to EDF.

- **Reforms to the economic hardship exception.** While we do not believe the economic hardship exception is necessary, and as discussed below encourage DNR to consider removing it in future rulemakings, we support the amendments to require operators to evaluate other options for utilizing gas other than pipeline takeaway.
- **Additional reporting requirements.** We support additional information requirements the department proposes to include in an operator's demonstration of economic hardship.

While we encourage DNR to finalize the proposed reforms as a step in the right direction towards preventing waste, recovering taxpayer resources, and reducing harmful pollution from Louisiana's oil wells, we also encourage the department to consider additional revisions through subsequent rulemakings. Specifically, we encourage DNR to consider:

- **Broadening the Prohibition on Routine Flaring in Subsequent Rulemaking:** DNR's proposed prohibition on routine flaring would apply only at wells with gas to oil ratios greater than 2000 standard cubic feet to one barrel of oil and at all horizontal wells. This prohibition does not go as far as actions taken by leading oil and gas producers and states, such as Colorado and New Mexico, which have committed to ending routine flaring at all wells, regardless of production characteristics.
- **Removing Economic Hardship Exception and the Stripper Well Exemption in Subsequent Rulemaking:** The proposal continues to allow operators to vent based on economic considerations. We do not think an economic exception on venting is ever appropriate or necessary. Nor do we believe such considerations justify routine flaring. Operators have a suite of available, cost-effective gas capture methods and technologies to conserve, rather than waste, gas. These include using the gas onsite to replace purchased fuel, injecting the gas, converting the gas to compressed natural gas and sending it to processing for sales, or using the gas for gas-to-wire projects. Leading states such as Colorado and New Mexico do not exempt low-producing wells from restrictions on venting and flaring, and many cost-effective gas capture methods and technologies are available at even low-producing wells.

The Louisiana Budget Project commends the statewide rule-making process to reduce energy waste, capture lost taxpayer resources, and protect Louisiana's public health. We likewise commend Gov. John Bel Edwards Administration's commitment to managing its oil and gas industry as part of its 2022 Climate Action Plan.

As advocates for budgetary discipline, we urge the administration to move forward on these proposed amendments. And we urge policymakers to prioritize this issue and ensure that necessary funds are allocated to implement and enforce it effectively.

Jan Moller
Executive Director
Louisiana Budget Project

Ned Randolph
Policy Advisor
Louisiana Budget Project

Carrie Wiebelt

From: Debra Joseph <josephdebra1@gmail.com>
Sent: Monday, August 21, 2023 12:03 PM
To: Carrie Wiebelt; contact@togetherla.org
Cc: Debra Joseph
Subject: End practice of routine venting and flaring throughout Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wiebelt

My name is Debra Joseph, and I reside in New Orleans, La.

I am sharing my concerns about the practice by companies with oil wells, throughout La., that are allowed to vent and flare.

It is important that the air quality in Louisiana be changed immediately. Me and all the citizens of this state deserve to be free from inhaling gases. The release of methane gases from these wells, along with other causes, is directly related to climate change, which is causing devastation in this state and the world.

It is important that all humans on God's earth work diligently to change the direction that the earth is going thru, because of the emission of gases, which is causing climate change.

The devastation that is happening to the earth is no joking matter and the companies should want to preserve the earth, minimize the deterioration of God's earth.

I understand that by ending the routine venting and flaring of the wells, the state revenue will increase, because methane can be used to fuel households.

We need the Office of Conservation "to step up to the plate" make these changes to prolong the lives of the people of this state and to save the planet. This decision should be a priority for the department, because climate change is getting worse, creating financial woes for families, communities, cities, states and the federal government.

Louisiana companies are making billions of dollars while destroying the earth. Please take the proper stance to end the practice of routine venting and flaring in the state, protecting the people of the state and more so to work toward making changes in the climate.

God's earth has been "trashed " by many , and now it is time for all of us to take an active role in ensuring a healthy earth for our children, and their children.

There will be no earth in 20 years if we do not begin making changes and stand by those changes .

Please strengthen the rule regarding emission by the wells in the state. .

Thank you for listening and taking action .

Debra Joseph

Sent from Mail for Windows

Carrie Wiebelt

From: Ryan Hanson <netting_cranes0g@p2a.co>
Sent: Monday, August 21, 2023 12:18 PM
To: Carrie Wiebelt
Subject: Venting and Flaring of Natural Gas

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

Louisiana is already on the front lines of the climate crisis. Methane, a major component of natural gas, is a greenhouse gas 80 times more powerful than carbon dioxide. By adopting rules to cut methane waste and pollution, we will also increase revenue, reduce smog and toxic air pollution, and help safeguard our climate. This rule will also drive economic growth and job creation in the methane mitigation industry which provides well-paying jobs that are based in our hometowns.

LDNR's proposal represents significant improvements to its current rules, which only address the venting of natural gas with several, overly broad exemptions. Although some provisions of the proposal need clarity and it could do more to comprehensively prevent waste from Louisiana's oil wells, we support its provisions to:

- **Require Gas Management Planning at New Wells.** There are many economical and cost-effective methods to avoid venting and flaring of natural gas at oil wells. Operators of new wells are in an especially good position to avoid methane waste since they are in control of when and where to drill new wells.
- **Prohibit Routine Flaring at Certain Wells.** LDNR proposes to prohibit routine flaring at wells with gas to oil ratios greater than 2000 standard cubic feet to one barrel of oil and at all horizontal wells. Because it is applicable only to some wells, this proposal does not go as far as leading oil and gas producers and states have gone. However, it is a step in the right direction and will reduce methane waste in Louisiana, in particular from horizontal wells which are regulated for the first time.
- **Narrow the Existing Economic Hardship Exception.** LDNR proposes changes to its existing economic hardship exception to require an operator consider the economic feasibility of alternative uses of gas to routing to sales and provide additional information to justify its request. Although we believe this exception is unnecessary because of the cost-effective alternatives to methane waste and LDNR's retention of its existing stripper well exemption, we support LDNR's proposed amendments to narrow the applicability of the exception.
- **Require Reporting of Vented and Flared Gas.** We support additional reporting of vented and flared gas volumes and;

- Remove the Exemption for Horizontal Wells. LDNR's current rule exempts horizontally drilled wells from the existing prohibition on venting. We support LDNR's removal of this exemption.

For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Regards,
Ryan Hanson
5230 Laurel St
New Orleans, LA 70115

Carrie Wiebelt

From: Sandy Rosenthal <hoppinhill@gmail.com>
Sent: Monday, August 21, 2023 12:35 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Please stop public flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Sandy Rosenthal
1421 Soniat St, New Orleans, La 70115
504-891-8437

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Sandy Rosenthal

Founder of Levees.org

Speaker, Author, Podcast Host



Carrie Wiebelt

From: Jack Reno Sweeney <jacksweeney1997@gmail.com>
Sent: Monday, August 21, 2023 12:40 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Public comment on LDNR draft rule re: ending routine venting & flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To whom it may concern,

I am writing in favor of LDNR's proposed rule to end the practice of routine venting and flaring of methane and other gasses from oil and gas wells throughout Louisiana. Flaring is a massive waste of resources that we cannot afford given the skyrocketing cost of natural gas caused by European demand and increased exports of LNG.

Furthermore, in the frequent cases in which it is not performed properly and efficiently, flaring is a huge source of rogue methane emissions, which have over eighty times more warming potential than CO₂. Methane emissions from venting and flaring can consequently wipe out any progress that CO₂ emissions reductions would otherwise provide. Since the oil and gas industry is increasingly shifting its focus towards methane-based products rather than traditional petroleum-based fuels, this rule is badly needed to prevent the massive potential impact of rogue methane emissions as this sector of the oil and gas industry expands.

Finally, this rule would be an effective cost-saving measure and source of revenue for the state, as Louisiana wastes approximately \$16 million worth of methane through venting and flaring every year - enough to power every household in Baton Rouge for more than a year and a half.

Please adopt the proposed LDNR draft rule to benefit our environment, our economy, and all of Louisiana.

Sincerely,
Jack Reno Sweeney
Organizer, GreenARMY

Carrie Wiebelt

From: L L <muslov2011@hotmail.com>
Sent: Monday, August 21, 2023 12:55 PM
To: Carrie Wiebelt
Subject: Draft Venting and Flaring Oil Wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

It's about time we end methane gas burns by oil companies. Hasn't the climate been burned enough at this point in time? Humans are now under assault by mother nature, who is retaliating big time due to all of our trashing of the earth and polluting the air. Therefore, reducing toxic air pollution is a step in the right direction that we MUST take.

Thank you,
Lori Romano
1828 Valmont St.
Mandeville, La. 70448
985-624-5181

Carrie Wiebelt

From: Barbara Hargrove <abitabar5107@gmail.com>
Sent: Monday, August 21, 2023 1:01 PM
To: Carrie Wiebelt
Subject: Re stop venting and flaring at oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

It's past time to end this wasteful and polluting practice. According to the EPA, methane is 25 times more potent than carbon dioxide when it comes to heating the atmosphere and contributing to climate change.

In addition, it's incredibly wasteful to burn off methane for no purpose instead of using it as fuel to power homes or businesses.

Also, strengthen the "economic hardship" rule - oil companies are making record profits; they need to step up and do the right thing for the environment.

For the sake of our children, grandkids, and generations to come, end this harmful practice.

Barbara Hargrove
73006 Meadow Lark Dr, Abita Springs, LA 70420

Carrie Wiebelt

From: R Beck <robeck3@gmail.com>
Sent: Monday, August 21, 2023 1:09 PM
To: Carrie Wiebelt
Subject: My strong support for LDNR draft rule to end venting and flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Carrie Wiebelt,

I am writing to strongly support the Louisiana Department of Natural Resources (LDNR) draft rule to end the practice of venting and flaring for many oil wells throughout Louisiana.

As a mother, grandmother, and retired teacher this greatly matters to me - for the love and health of Louisiana citizens, especially our children. The State must stop allowing the expensive, rising health care costs from the sickening of its citizens due to toxic, air polluting methane gas (also the leading cause of our costly and horrific climate crisis) being irresponsibly burned by oil wells through routine venting and flaring.

I love Louisiana, I was born here and still live here. My WWII veteran father (a New Orleans native) always said that he grew up hearing the elders call Louisiana "God's Paradise". I believe it WAS that, for prior generations... but not now. I want Louisiana to prosper economically, and most importantly, humanely, and environmentally. We CAN do it all, if we work as a Team and focus first on Louisiana citizens, not only on a myopic, greedy profit line of polluting corporations.

I understand that your rule would INCREASE state revenue, by preventing the waste through burning of over \$16 million in methane gas per year. If anything, please strengthen the rule to make sure the "economic hardship" exception is not used as a loophole.

Please adopt a strong version of your rule and help put our beloved state back on the road to becoming "God's Paradise".

Thank you,

Rosary Beck

Carrie Wiebelt

From: Jodie Manale <jodie.manale@gmail.com>
Sent: Monday, August 21, 2023 1:14 PM
To: Carrie Wiebelt; Kahlida Lloyd
Subject: Approve draft rule which would end the practice of routine venting and flaring for many oil wells throughout Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Carrie Wiebelt and Louisiana Department of Natural Resources Office of Conservation

I am writing to implore you to approve the draft rule which would end the practice of routine venting and flaring for many oil wells throughout Louisiana. Right now there are virtually no limitations on routine venting and flaring of methane at oil wells. This is important to me because of the huge impact routine methane gas emissions are having on climate change. The extreme heat this summer is causing great hardship on many Louisianians, and we cannot continue to be the source of such a huge volume of toxic air pollution.

And, it is my understanding that the rule would INCREASE state revenue, by preventing the waste through burning of over \$16 million in methane gas per year. (That's enough gas to fuel every household in Baton Rouge for over a year and a half!).

I also ask that the LDNR Office of Conservation makes sure there is clear guidance for the rule. And, that you strengthen the rule to make sure the "economic hardship" exception is not used as a loophole. And, finally, you insure that the public has access to the # of exemptions that are granted and why.

This rule is a big step that can bring us into the 21st century! Please help make it happen! Thank you!

Stronger together,

Jodie Manale
pronouns: she/her/hers
325 Compromise Street
Kenner, Louisiana 70062
Cell: 504.444.5765

Carrie Wiebelt

From: Marta Badon <mab6750@yahoo.com>
Sent: Monday, August 21, 2023 1:23 PM
To: Carrie Wiebelt; Marta Badon
Subject: Restrict the practice of routine releases and burning of methane

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Weibelt:

My family and I encourage and applaud the adoption of the rule to restrict the practice of routine releases and burning of waste methane at oil wells in Louisiana.

This rule will help reduce methane gas emissions, one of the leading causes of climate change.

I have a 6 year old grandson, and I truly hope all children can grow up without facing a terrible climate change catastrophe. Thank you.

Marta Badon 59591 Badon rd
Slideell LA 70460

Carrie Wiebelt

From: Pat Driscoll <pdriscoll1223@yahoo.com>
Sent: Monday, August 21, 2023 1:31 PM
To: Carrie Wiebelt
Subject: Support for Draft Rule on venting and flaring oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To Whom It May Concern:

I am a resident of River Ridge, La. While I sit here wondering what this year's hurricane season will bring, I am reading news about wildfires in the western United States and Canada and a major storm causing flooding in California. This week the weather forecast warns me of multiple days where the temperature will be 100 degrees or higher.

I believe the scientists who say that the extreme heat and weather events are caused by burning of fossil fuels. I, therefore, support the proposed rule that LDNR is considering. Ending the practice of venting and flaring oil wells will reduce emissions of greenhouse gases that are causing climate change. It will alleviate threats to the future of my 4 young grandchildren.

Please adopt this rule. I would also support eliminating or restricting the hardship exception so the rule is as strong as possible.

Patricia L. Driscoll

Sent from my iPhone

Carrie Wiebelt

From: Byron G. Martin <1bgmconsultllc@gmail.com>
Sent: Monday, August 21, 2023 1:39 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methan Gas Burning Venting has to Change.

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To Whom it May Concern:

Climate Change is Not a Hoax nor a Res Hering!! The unreversible damage point may already be upon us.

State Revenue can be gathered rather than continuous Pollution of our Air and Water. When will the People who service this Industry be Cared About rather than Replaces or Relocated!?!

Technical Verbage needs to be Simple Enough so that Lawyers and Lobbyist do not Confuse the Public and Disguise the Consequences.

How Much Pollution is Acceptable? If it generates a Substance that Can Not be Disposed of Without Creating Hazards to Lives...There is No Minimum Allowable ... They are Killing our Natural Resources and Thus Our Right to Live Off the Land!!

Take Away Their Easy Button!!!

Enough Already,

BGM

Carrie Wiebelt

From: Melanie Miranda <melmiranda111@yahoo.com>
Sent: Monday, August 21, 2023 1:58 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Methane

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Save the planet & LA by limiting Methane releases from Oil platforms. These poisonous fumes are ruining our environment and is causing global warming.

Melanie Miranda
2349 Constance Street
N. O. LA. 70130

Sent from my iPhone

Carrie Wiebelt

From: Lauren Lastrapes <lلاstrapes@bfhsla.org>
Sent: Monday, August 21, 2023 2:14 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: LDNR draft rule

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hi,

I think the current draft rule ending routine flaring and venting for oil wells in Louisiana should be made final. We need to reduce toxic air pollution in the state. It's wild that we frequently live in Louisiana like our actions don't have harmful impacts. Y'all know it's not good to keep exposing the people who live here to harm. Make the rule final.

Cheers,

Lauren Lastrapes

--

<https://abolitionistteachingnetwork.org/>

Carrie Wiebelt

From: Hep Heather <hepheather@gmail.com>
Sent: Monday, August 21, 2023 2:42 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: venting of methane

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please regulate the venting of methane gas in Louisiana.

For years as I have traveled, I have heard people who have seen our license plates mock the "Sportsman's Paradise" logo of Louisiana due to the stance the state takes on environmental issues.

Our swamps, waterways, and forests are beautiful and yet we are known for cancer alley and being the playground for oil companies whose profits go to Texas or elsewhere. I no longer reside there but my family does and I return to Louisiana multiple times a year. I am proud to be from Louisiana in so many ways. Please make it safer for my brother and his family as well as my cousins.

--

Peace, Salaam, Shalom,

Heather

Carrie Wiebelt

From: Patricia Gilley <patriciadordangilley@gmail.com>
Sent: Monday, August 21, 2023 2:47 PM
To: Carrie Wiebelt; Rev. Irvine and Rev. Jackson, Together Louisiana
Subject: venting of oil webs

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Please think of our children and grandchildren. We have not been good stewards of our planet in the 75 years I have been around. But, we must start somewhere. Let's stand firm on this one: No venting, burning, etc. at the websites!.

Pat Gilley, Esq.

patriciadordangilley@gmail.com

Carrie Wiebelt

From: James Hiatt <james@betterbayou.net>
Sent: Monday, August 21, 2023 2:51 PM
To: Carrie Wiebelt
Subject: Venting/Flaring of Natural Gas

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Good afternoon,

I am writing to express my strong support for the draft rule aimed at eliminating routine flaring and venting of methane at oil wells. In February 2021, 14 year old Zalee Day-Smith was killed when an old oil tank battery exploded in nearby Beauregard Parish. This deadly and horrific incident was graphic, yet the ways in which oil and gas has been slowly killing people and communities for decades because of lax regulations and their enforcements must come to an end. As a concerned citizen and resident of Calcasieu Parish in Louisiana, I believe that this rule is a crucial step towards creating a healthier and more sustainable environment for all of us.

Current Lack of Limitations: At present, there are virtually no limitations on routine venting and flaring of methane at oil wells.

And definitely no limitations on venting and flaring at the over 4500 abandoned and orphaned wells that are now entrusted to the public to clean up after oil majors and others took their profits and left us holding the bag. This lack of regulation has allowed for unchecked emissions, contributing to environmental degradation and public health concerns.

Reduction of Toxic Air Pollution: The proposed rule will significantly reduce toxic air pollution. This is of paramount importance to me and many others, as clean air is a fundamental right and essential for the well-being of all residents. The adverse health effects of air pollution, including respiratory issues and other related ailments, cannot be ignored.

Mitigating Climate Change: Methane gas emissions are one of the leading causes of climate change. By curbing these emissions, the rule will play a pivotal role in slowing down the adverse effects of global warming, ensuring a safer future for the next generations.

Economic Benefits: The rule is not only environmentally sound but also economically beneficial. By preventing the wastage of over \$16 million in methane gas annually through burning, the state stands to increase its revenue. To put this into perspective, this amount of gas could fuel every household in Baton Rouge for over a year and a half!

Strengthening the Rule: While I wholeheartedly support the draft rule, I urge the DNR to ensure that the "economic hardship" exception is not exploited as a loophole. It is essential that any exceptions are genuinely based on economic hardship and not used as a means to bypass the rule's intent.

I commend the Louisiana Department of Natural Resources for taking this progressive step towards a cleaner and more sustainable future. I urge you to adopt and even strengthen this rule to ensure that Louisiana remains a beautiful and healthy place to live for all its residents.

Thank you for your attention to this matter. I look forward to seeing the positive impact of this rule in our great state.

Sincerely,
James Hiatt

Carrie Wiebelt

From: Susan Barkulis <sbarkulis2013@gmail.com>
Sent: Monday, August 21, 2023 2:52 PM
To: Carrie Wiebelt
Subject: Public comment: Rule re flaring and venting gases

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms Wiebelt

So many of us who support our public institutions and pay our tax dollars are losing faith as the public good seems to continuously be overshadowed by powerful industries resistant to changes recommended by experts and aimed at reducing global warming pollutants.

I understand that LDNR is considering a rule which promises to greatly curtail the venting and flaring of oil wells in our state. I also understand that this practice of venting and flaring wastes millions of dollars in vital energy resources including tax payer dollars. We are counting on LDNR leadership and courage to take actions that will protect our families and our environment. We have long since passed the time where we can afford a business as usual approach to the severe challenges our state, nation and world are facing due to climate change. LDNR is in a pivotal position to help our industries make the kinds of shifts we need to ensure a safer, sustainable and economical energy policy here in our state.

Let's pass the rule to curtail venting and flaring. Let's be sure that the "hardship" exemption does not become an easy by-pass to the rule.

Thank you for your work.

Susan Barkulis - 11824 Archery Dr. BR, LA 70815

Carrie Wiebelt

From: pst805@aol.com
Sent: Monday, August 21, 2023 2:56 PM
To: Carrie Wiebelt

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

it matters to you that the State stops allowing methane gas to be burned by oil wells through routine venting and flaring.

Here are a few points to draw from, but please put things in your own words. (Don't just copy and paste)

Right now there are virtually no limitations on routine venting and flaring of methane at oil wells

This rule will reduce toxic air pollution -- and why that's important to you.

The rule will help reduce methane gas emissions, which is one of the leading causes of climate change.

The rule would INCREASE state revenue, by preventing the waste through burning of over \$16 million in methane gas per year. (That's enough gas to fuel every household in Baton Rouge for over a year and a half!).

If anything, strengthen the rule to make sure the "economic hardship" exception is not used as a loophole.

This rule is a big step in the right direction. Please help make it happen!

Carrie Wiebelt

From: ccozic16@gmail.com
Sent: Monday, August 21, 2023 3:02 PM
To: Carrie Wiebelt
Subject: Public comment on the proposed rule to limit the wasting of methane gas by constant venting and flares

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I am writing concerning the practice the venting and flaring of oil wells in Louisiana, which releases methane into the atmosphere. From what I have read, this toxic, polluting gas is just wasted, and could be put to good use as fuel, while saving our air quality and the ozone at the same time.

We owe it to our children and grandchildren to keep the air as clean as we possibly can. We are risking all of our lives and health by continuing to allow these companies to contaminate our air and environment.

The rule under consideration would go a long way to achieving this goal. Especially if it doesn't let the companies find loopholes to get around the restrictions.

I understand it would also generate money for the state which we need. So it's a win win!

Thank you,
Christine Cozic

Carrie Wiebelt

From: Logan Wolf <lwolf@earthworksaction.org>
Sent: Monday, August 21, 2023 3:11 PM
To: Carrie Wiebelt
Subject: End the practice of routine venting and flaring for many oil wells throughout Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

As we all know, Louisiana is in the middle of the longest and hottest summer we have ever experienced. Weeks long of 100 degree plus weather has made one thing abundantly clear, we need to act to save the Earth. Stopping venting for wells is a good start. I support this rule!

Logan C Wolf

Carrie Wiebelt

From: Motsenbocker, Carl E. <CMotsenbocker@agcenter.lsu.edu>
Sent: Monday, August 21, 2023 3:11 PM
To: Carrie Wiebelt
Subject: Stop allowing methane gas to be burned in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hello Carrie:

I am emailing you to urge that the LDNR Office of Conservation ban the practice of allowing methane gas to be burned by oil wells through routine venting and flaring. To me as a scientist, there are several reasons that this practice should be banned and bring the state of Louisiana up to better practices.

- Climate change is a concern for everyone, especially the younger generation in Louisiana. Methane gas burning is a leading cause of climate change and can easily be stopped, especially the routine venting and burning.
- Reducing air pollution and the toxic impacts on humans, the environment, and wildlife is really important and will reduce the health risk to all of us in our state.
- Reducing the burning of methane would actually raise state revenue and provide significant savings in methane gas that can be used for energy generation and reduce waste.
- At the very least, please strengthen the rule to make sure the "economic hardship" exception is not used as a loophole for the burning of methane gas.

I urge the LDNR Office of Conservation to ban the burning of methane gas. If you have any questions about my email, please contact me.

Sincerely,
Carl

Carrie Wiebelt

From: Andrew Poteet <ajp2681@gmail.com>
Sent: Monday, August 21, 2023 3:14 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Flaring Emissions - Proposed New Rule

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Studies from the U.S. National Institutes of Health and National Institute of Environmental Health Sciences have shown that women living near areas with heavy flaring experience higher likelihood of premature birth as well as having babies that may suffer complications such as immature lungs, difficulty regulating body temperature, and slow weight gain.

I can think of no better reason to limit flaring than this. Reducing toxic air pollution through this rule is an urgent measure, however, addressing the environmental risks of flaring through well plugging also has the potential to create jobs as well as allow for repurposing land for other developmental uses. So there are economic gains to be found in this rule, and future rules of similar nature.

Sincerely,

- Andy Poteet

Carrie Wiebelt

From: Cullen Leege <cullen@advocacymail.com>
Sent: Monday, August 21, 2023 3:15 PM
To: Carrie Wiebelt
Subject: Petitions supporting LDNR's proposal to increase protections to cut methane waste and pollution
Attachments: Methane petition signers - LA - 8.19.23-8.23.23.pdf

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

To whom it may concern,

Please find the attached 62 letters, from concerned Louisianans, urging the Louisiana Department of Natural Resources to swiftly finalize its proposed rule to improve how wasteful venting and flaring from oil and gas operations are addressed in the state.

Sincerely,
Cullen Leege
Director of Operations | He/Him



Be a good influence.

August 21, 2023

To The Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

Louisiana is already on the front lines of the climate crisis. Methane, a major component of natural gas, is a greenhouse gas 80 times more powerful than carbon dioxide. By adopting rules to cut methane waste and pollution, we will also increase revenue, reduce smog and toxic air pollution, and help safeguard our climate. This rule will also drive economic growth and job creation in the methane mitigation industry which provides well-paying jobs that are based in our hometowns.

LDNR's proposal represents significant improvements to its current rules, which only address the venting of natural gas with several, overly broad exemptions. Although some provisions of the proposal need clarity and it could do more to comprehensively prevent waste from Louisiana's oil wells, we support its provisions to:

- **Require Gas Management Planning at New Wells.** There are many economical and cost-effective methods to avoid venting and flaring of natural gas at oil wells. Operators of new wells are in an especially good position to avoid methane waste since they are in control of when and where to drill new wells.
- **Prohibit Routine Flaring at Certain Wells.** LDNR proposes to prohibit routine flaring at wells with gas to oil ratios greater than 2000 standard cubic feet to one barrel of oil and at all horizontal wells. Because it is applicable only to some wells, this proposal does not go as far as leading oil and gas producers and states have gone. However, it is a step in the right direction and will reduce methane waste in Louisiana, in particular from horizontal wells which are regulated for the first time.
- **Narrow the Existing Economic Hardship Exception.** LDNR proposes changes to its existing economic hardship exception to require an operator consider the economic feasibility of alternative uses of gas to routing to sales and provide additional information to justify its request. Although we believe this exception is unnecessary because of the cost-effective alternatives to methane waste and LDNR's retention of its

existing stripper well exemption, we support LDNR's proposed amendments to narrow the applicability of the exception.

- Require Reporting of Vented and Flared Gas. We support additional reporting of vented and flared gas volumes.
- Remove the Exemption for Horizontal Wells. LDNR's current rule exempts horizontally drilled wells from the existing prohibition on venting. We support LDNR's removal of this exemption.

For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Eric Cartier, 70802

August 21, 2023

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Sincerely,

Marta Badon, 70460

August 21, 2023

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Sincerely,

Irene Montero, 70734

August 21, 2023

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Sincerely,

Sherrie LaBove, 70663

August 21, 2023

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Sincerely,

Garry Van Amburg, 70062

August 20, 2023

To The Louisiana Department of Natural Resources,

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Carolyn Burns, 70433

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Susan Levin, 70002

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Jamison Aycock, 70360

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Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Lynette Bech, 70438-2602

August 20, 2023

To The Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

Louisiana is already on the front lines of the climate crisis. Methane, a major component of natural gas, is a greenhouse gas 80 times more powerful than carbon dioxide. By adopting rules to cut methane waste and pollution, we will also increase revenue, reduce smog and toxic air pollution, and help safeguard our climate. This rule will also drive economic growth and job creation in the methane mitigation industry which provides well-paying jobs that are based in our hometowns.

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Peggy Armstrong, 70433

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Mark Barrios, 70755-3520

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Karen Babin, 70001-5127

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Christie Ruppel, 70460

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Emily Lain, 70503

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We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

Louisiana is already on the front lines of the climate crisis. Methane, a major component of natural gas, is a greenhouse gas 80 times more powerful than carbon dioxide. By adopting rules to cut methane waste and pollution, we will also increase revenue, reduce smog and toxic air pollution, and help safeguard our climate. This rule will also drive economic growth and job creation in the methane mitigation industry which provides well-paying jobs that are based in our hometowns.

LDNR's proposal represents significant improvements to its current rules, which only address the venting of natural gas with several, overly broad exemptions. Although some provisions of the proposal need clarity and it could do more to comprehensively prevent waste from Louisiana's oil wells, we support its provisions to:

- **Require Gas Management Planning at New Wells.** There are many economical and cost-effective methods to avoid venting and flaring of natural gas at oil wells. Operators of new wells are in an especially good position to avoid methane waste since they are in control of when and where to drill new wells.
- **Prohibit Routine Flaring at Certain Wells.** LDNR proposes to prohibit routine flaring at wells with gas to oil ratios greater than 2000 standard cubic feet to one barrel of oil and at all horizontal wells. Because it is applicable only to some wells, this proposal does not go as far as leading oil and gas producers and states have gone. However, it is a step in the right direction and will reduce methane waste in Louisiana, in particular from horizontal wells which are regulated for the first time.
- **Narrow the Existing Economic Hardship Exception.** LDNR proposes changes to its existing economic hardship exception to require an operator consider the economic feasibility of alternative uses of gas to routing to sales and provide additional information to justify its request. Although we believe this exception is unnecessary because of the cost-effective alternatives to methane waste and LDNR's retention of its

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For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

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Sincerely,

Teyrienne Payne, 70092

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Bonnie Kearney, 70115

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Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Andrew Jackson, 71103

August 19, 2023

To The Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

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Louisiana is already on the front lines of the climate crisis. Methane, a major component of natural gas, is a greenhouse gas 80 times more powerful than carbon dioxide. By adopting rules to cut methane waste and pollution, we will also increase revenue, reduce smog and toxic air pollution, and help safeguard our climate. This rule will also drive economic growth and job creation in the methane mitigation industry which provides well-paying jobs that are based in our hometowns.

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Durriya Sarkar, 70808

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Jim Green, 70065

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Dave Saze, 70820

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MC Bernard, 70115

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We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

Louisiana is already on the front lines of the climate crisis. Methane, a major component of natural gas, is a greenhouse gas 80 times more powerful than carbon dioxide. By adopting rules to cut methane waste and pollution, we will also increase revenue, reduce smog and toxic air pollution, and help safeguard our climate. This rule will also drive economic growth and job creation in the methane mitigation industry which provides well-paying jobs that are based in our hometowns.

LDNR's proposal represents significant improvements to its current rules, which only address the venting of natural gas with several, overly broad exemptions. Although some provisions of the proposal need clarity and it could do more to comprehensively prevent waste from Louisiana's oil wells, we support its provisions to:

- **Require Gas Management Planning at New Wells.** There are many economical and cost-effective methods to avoid venting and flaring of natural gas at oil wells. Operators of new wells are in an especially good position to avoid methane waste since they are in control of when and where to drill new wells.
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- **Narrow the Existing Economic Hardship Exception.** LDNR proposes changes to its existing economic hardship exception to require an operator consider the economic feasibility of alternative uses of gas to routing to sales and provide additional information to justify its request. Although we believe this exception is unnecessary because of the cost-effective alternatives to methane waste and LDNR's retention of its

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For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Linda Van Aman, 70032

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Louella Green, 70058

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- **Prohibit Routine Flaring at Certain Wells.** LDNR proposes to prohibit routine flaring at wells with gas to oil ratios greater than 2000 standard cubic feet to one barrel of oil and at all horizontal wells. Because it is applicable only to some wells, this proposal does not go as far as leading oil and gas producers and states have gone. However, it is a step in the right direction and will reduce methane waste in Louisiana, in particular from horizontal wells which are regulated for the first time.
- **Narrow the Existing Economic Hardship Exception.** LDNR proposes changes to its existing economic hardship exception to require an operator consider the economic feasibility of alternative uses of gas to routing to sales and provide additional information to justify its request. Although we believe this exception is unnecessary because of the cost-effective alternatives to methane waste and LDNR's retention of its

existing stripper well exemption, we support LDNR's proposed amendments to narrow the applicability of the exception.

- Require Reporting of Vented and Flared Gas. We support additional reporting of vented and flared gas volumes.
- Remove the Exemption for Horizontal Wells. LDNR's current rule exempts horizontally drilled wells from the existing prohibition on venting. We support LDNR's removal of this exemption.

For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Keyon Jeff, 70360

August 19, 2023

To The Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

Louisiana is already on the front lines of the climate crisis. Methane, a major component of natural gas, is a greenhouse gas 80 times more powerful than carbon dioxide. By adopting rules to cut methane waste and pollution, we will also increase revenue, reduce smog and toxic air pollution, and help safeguard our climate. This rule will also drive economic growth and job creation in the methane mitigation industry which provides well-paying jobs that are based in our hometowns.

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- **Require Gas Management Planning at New Wells.** There are many economical and cost-effective methods to avoid venting and flaring of natural gas at oil wells. Operators of new wells are in an especially good position to avoid methane waste since they are in control of when and where to drill new wells.
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For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Mary Todd, 70806

August 19, 2023

To The Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

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For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Ryan Hanson, 70115

August 19, 2023

To The Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

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For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Anne Harris, 70005

August 19, 2023

To The Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

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For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Franklin I. Hughes, 70005

August 19, 2023

To The Louisiana Department of Natural Resources,

We need to slash methane waste in all forms to protect our natural resources, the health of our air and our climate's future. That's why we are counting on the Louisiana Department of Natural Resources to swiftly finalize its proposed venting and flaring rule as an important step in addressing methane waste in Louisiana.

In 2019, fossil fuel producers in Louisiana wasted 5.2 billion cubic feet of natural gas worth nearly \$16 million through venting and flaring alone. That's enough natural gas to fuel all the households in Baton Rouge for over a year and a half. Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared. And it's not just hurting our pocketbooks, it's also hurting our health and our climate.

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For these reasons, we support the increased protections to cut methane waste and pollution in this proposal and also urge LDNR to take additional action in future rulemakings to further reduce methane waste in Louisiana.

Thank you for working to prevent the waste of our natural resources and ensure a cleaner and healthier Louisiana. We urge you to quickly finalize these rules.

Sincerely,

Cynthia Morse, 70118

Carrie Wiebelt

From: Ann-Grace Martin <anngrace.martin572@gmail.com>
Sent: Monday, August 21, 2023 3:20 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Public comment - cut methane emissions in Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt & Office of Conservation,

It matters to me as a resident of Louisiana that the State stops allowing methane gas to be burned by oil wells through routine venting and flaring.

A few reasons why are listed below:

- Right now there are virtually no limitations on routine venting and flaring of methane at oil wells
- This rule will reduce toxic air pollution, which affects the health of plants, animals and people all over the state
- The rule will help reduce methane gas emissions, which is one of the leading causes of climate change.
- The rule would INCREASE state revenue, by preventing the waste through burning of over \$16 million in methane gas per year. (That's enough gas to fuel every household in Baton Rouge for over a year and a half!).
- If anything, please strengthen the rule to make sure the "economic hardship" exception is not used as a loophole.

Thank you for reading!

Best,

Ann-Grace Martin

--

Ann-Grace Martin
(310) 270-7706 | [LinkedIn](#)

•

Carrie Wiebelt

From: Charlotte Clarke <charlotte@commongroundrelief.org>
Sent: Monday, August 21, 2023 3:26 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Support for LDNR restrictions on methane venting and flaring

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Hello Ms. Carrie Wiebelt,

I am writing in support of the LDNR draft rule to end the practice of routine venting and flaring for many oil wells throughout Louisiana.

It matters to me that the State stops allowing methane gas to be burned by oil wells through routine venting and flaring. We must urgently address climate change and this rule is one crucial piece of protecting a livable future for Louisiana residents. What could be more important?

Right now there are virtually no limitations on routine venting and flaring of methane at oil wells so we need a stopgap measure in place.

This rule will reduce toxic air pollution -- it is obvious that we should support legislation that will promote the livelihood of residents, particularly since there are race and class disparities in this area.

The rule will help reduce methane gas emissions, which is one of the leading causes of climate change.

The rule would INCREASE state revenue, by preventing the waste through burning of over \$16 million in methane gas per year. (That's enough gas to fuel every household in Baton Rouge for over a year and a half!).

If anything, please strengthen the rule to make sure the "economic hardship" exception is not used as a loophole.

I appreciate you considering this input and I hope you move forward with Louisiana citizen's interests in mind on this issue.

Charlotte Clarke
Co-Director

1800 Deslonde Street
New Orleans, LA 70117

o. 504-312-1729

www.commongroundrelief.org

Carrie Wiebelt

From: Anne Frazer <acfrazer@aol.com>
Sent: Monday, August 21, 2023 3:32 PM
To: Carrie Wiebelt
Subject: "Venting and Flaring of Natural Gas"

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Reference: "Venting and Flaring of Natural Gas"

Dear Ms. Carrie Wiebelt,

Thank you for the opportunity to comment on the proposed rule of the Louisiana Department of Natural Resources' Office of Conservation: "Venting and Flaring of Natural Gas."

The release of methane to the atmosphere, due to the venting and flaring of natural gas in oil and gas drilling operations, is a significant driver of global warming and subsequent climate change.

I am very much in favor of the proposed rule because it prohibits routine venting and flaring of natural gas and will thereby reduce natural gas waste, recover reserves, and help mitigate climate change.

However, I am concerned that the proposed rule appears to have a significant loophole that allows operators to avoid the prohibition by demonstrating economic hardship. I hope the final version of the rule will remove this loophole.

Sincerely,

Anne Frazer

516 Hilton St., Monroe, LA 71201

acfrazer@aol.com

Carrie Wiebelt

From: Sylvia Martinez <sylviamartinez538@gmail.com>
Sent: Monday, August 21, 2023 3:46 PM
To: Carrie Wiebelt
Subject: End routine venting and flaring of methane at oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Louisiana residents need all the help we can get for cleaner air, and the proposed new rule will help to cut air pollution. Our children and elderly especially suffer from respiratory ailments that can be partially alleviated by not burning methane. It would also cut the waste of this gas, which can be handled in a more conservative way and save money for the companies and for the state to not have to bear the burden of public health costs.

Also--please don't let the "hardship" exception become a loophole for companies to continue burning as usual. The economic hardship is on **us** now to keep healthy in a toxic environment, while they continue to post profits.

Thank you for considering the public good as paramount in your decision making process.

Sylvia L. Martinez
538 Magnolia Wood Ave.
Baton Rouge, LA 70808

Carrie Wiebelt

From: Gerry <grydrscil@gmail.com>
Sent: Monday, August 21, 2023 3:48 PM
To: Carrie Wiebelt
Subject: LDNR Draft Rule to End Gass Venting from Oil Wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I am writing to support this proposed rule to end methane gas venting from oil wells.

1. This practice contributes to global warming
2. Methane gas contaminates the air in local communities which contributes to pulmonary illnesses.
3. Many states have banned methane release into the atmosphere, for health, safety and environmental reasons.

Gerald D. Driscoll
248-330-752



504.525.1528
healthygulf.org

PO Box 2245
New Orleans, LA 70130

August 21, 2023

Carrie Wiebelt
Office of Conservation
Engineering Administrative Division
P.O. Box 94275
Baton Rouge, LA 70804-9275
Sent via email: carrie.wiebelt@la.gov

RE: Comments on Office of Conservation's Notice of Intent to Amend "Venting and Flaring of Natural Gas" Rules, LAC 43:XIX, Subparts 1 and 15.

Dear Ms. Wiebelt,

On behalf of Healthy Gulf,¹ please accept the following comments regarding the Louisiana Department of Natural Resources Office of Conservation's (LDNR) Notice of Intent to Amend "Venting and Flaring of Natural Gas" Rules, LAC 43:XIX, Subparts 1 and 15. We reserve the right to rely on all comments submitted.

While there is still much room for improvement in the proposed rules, Healthy Gulf is in support of moving the proposed venting and flaring rules forward. If properly implemented these rules would significantly reduce the methane that needlessly flows out of wells, polluting communities and exacerbating climate change.

In 2019 alone, fossil fuel producers in Louisiana wasted over \$16 million worth of methane gas just through venting and flaring. That's enough gas to fuel all the households in Baton Rouge for over a year and a half! Oil and gas operators also avoid paying taxes and royalties on wasted gas, so federal and state governments, as well as private landowners, lose revenue when gas is vented and flared.

By cutting methane waste, we can reduce toxic air pollution, increase public health across the state, lessen our impact on the coast and climate, and create good-paying jobs.

With all this in mind we support the LDNR in proposing strong rules that will reduce methane pollution from oil production. While the rule stops short of implementing a complete ban on venting and flaring from oil wells, it is a substantial first step and trust LDNR will continue to strengthen the rules once finalized.

¹ Healthy Gulf's purpose is to collaborate with and serve communities who love the Gulf of Mexico by providing the research, communications, and coalition-building tools needed to reverse the long pattern of over exploitation of the Gulf's natural resources. Healthy Gulf has membership throughout the Gulf South, including Louisiana. <https://healthygulf.org/>

In order to improve the proposed rule we recommend the following to be considered in a future rulemaking:

§3507.A

Stopping methane waste is most importantly about public safety and health. Therefore we do not feel that venting should ever be permissible except for emergency safety reasons. We suggest the following change to this section:

A. The venting of natural gas from any well producing in the state of Louisiana is hereby expressly prohibited except in those instances where permissible flaring as specified in §3507.B is not an ~~economical~~ or safe alternative.

While the proposed rule is not as protective as some of the provisions in the previously noticed Potpourri notice, this rule, if properly enforced, is a significant step forward. Included in this proper enforcement is the need to ensure that economic hardship exemptions are examined carefully, and ideally never provided to allow venting.

Thank you for the opportunity to comment on the proposed rules for venting and flaring at Louisiana oil wells. If you have any questions, feel free to contact me.

Sincerely,



Matt Rota
Senior Policy Director
matt@healthygulf.org
504.377.7840

Carrie Wiebelt

From: andrea matherne <andrea.matherne@gmail.com>
Sent: Monday, August 21, 2023 4:07 PM
To: Carrie Wiebelt; contact@togetherla.org
Subject: Re: LDNR Rule to stop methane gas flaring /venting from LA oil wells

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Good afternoon Carrie,

My name is Andrea Matherne. I am a lifelong resident of Baton Rouge. It means a lot to me that LDNR is even considering a rule to limit the flaring and venting of methane gas here in Louisiana, a heavily industrialized state. We have a lot of work to do to make our state better, but proposals like this rule make me hopeful that we want to do what it takes to make that happen.

Limitations for these practices is hopefully just the beginning of a better Louisiana. With virtually no limitations on them currently, we have the opportunity to make Louisiana air quality better, and reduce our emissions (methane gas is worse than CO2 emissions!). This means so much to me, again, as a lifelong resident of this state. I was raised in North Baton Rouge in the Baker area. My family's home was closer to the Exxon plant than it was to the school my sisters and I went to. For families to have cleaner air and a better quality of life in all of Louisiana is very important to me. The children and families here deserve us to be looking out for them.

Aside from the other reasons I've mentioned, money is a driving factor in many decisions in our state. This rule would increase the state's revenue by preventing waste from burning, by over \$16 million in methane gas per year. That kind of money is significant, and I hope if the other reasons weren't enough, that this one would be. That is enough gas to fuel every household in Baton Rouge for over a year.

I hope you'll strongly consider these reasons and others from our community in your decision. It would be a huge step in the right direction for Louisiana. The rule may not be perfect, but starting any big change is the toughest part of change itself.

Thank you for reading, Carrie, and I hope you have a terrific afternoon.

For a better Louisiana,
Andrea Matherne
(225) 485-4134
Resident in 70806

Carrie Wiebelt

From: Tanya DiMaggio <gregtanyaizzy@bellsouth.net>
Sent: Monday, August 21, 2023 4:19 PM
To: Carrie Wiebelt
Subject: Concerning The Draft Rule Ending Venting and Flaring Oil Wells In Louisiana

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Ms. Wiebelt,

I am encouraged by the draft rule proposition to end this unnecessary practice by the oil and gas industry on our state. As we both know, there are currently virtually no limitations on venting and flaring of methane at oil wells. It is time to bring this bad practice to an end.

Implementing this rule will help reduce methane gas emissions, one of the leading causes of climate change.

Passing this rule would INCREASE state revenue by preventing the waste through burning of over \$16 million in methane gas each year. That's enough gas to fuel every household in Baton Rouge for over a year and a half! Furthermore, it's good for the environment and the economy - a clear win/win.

Please strengthen the rule to ensure the "economic hardship" exception is not used as a loophole. This rule is a clear step in the right direction. Please help make it happen.

Thank you for your time and consideration.

Gregory Fisk

Sent from my iPhone

Carrie Wiebelt

From: Elizabeth Soychak <laundrylizabeth@gmail.com>
Sent: Monday, August 21, 2023 4:24 PM
To: Carrie Wiebelt
Subject: Venting & Flaring of Natural Gas

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Ms. Wiebelt,

I'm writing today to urge LDNR to pass the rule that ends routine venting and flaring of methane at oil wells in Louisiana.

There are several reasons to end this practice, the most important of which is to reduce air pollution. Black communities and poor communities often bear the worst consequences of pollution in our state and this needs to stop.

As the Co-Chair of Climate Reality Project Greater New Orleans Chapter, the second reason for me is the adverse effect methane has on our climate. Science shows us methane emissions heat our atmosphere 25 times faster than CO₂, and given the extreme conditions unfolding this summer across our world, we must immediately take steps to stop more methane from escaping. Louisiana can make a real difference in the fight against global warming!

Thank you for your time and serious consideration of this important matter.

All the best,
Elizabeth Soychak
Co-Chair
Climate Reality Project, Greater New Orleans Chapter
Member, 350 New Orleans