

ES-11 Comments
Recommendation 23
Methane and CO2 reduction in oil and gas operations, including fuel use and emissions
reduction in venting and flaring

The economic impacts of any legislation must be determined and be a part of the decision.

Government meddling/incentives rarely result in progress. Montana should be working to remove barriers to progress not impeding them by adding bureaucracy that adds no value to the end product. Furthermore, this report was based on a politically correct directive which assumes there is a man-made climate crisis. While this assumption has the backing of the media and politicians it has little support from the scientific community. Hence the reporting by the media of the relative minority that support the theory. Technology should be able to stand on its own merits without government incentives.

Who determines "achievable" or "cost effective"?

only if these can be reasonably met by industry and I do not believe they can.

This is fine except for requiring permits. Permitting is more government.

There should be a cost/benefit analysis required. The benefits do not justify the costs using sound science. More taxes, regulations and red tape is not what will help Montana.

depends on the cost.

While I support whole heartedly encouraging natural gas companies to participate in the Energy Star program, I'm not sure what permits should be required or enforced.

I would support this if I thought government's way of encouraging was to clear the way to more easily market natural gas [read build more pipelines] instead of flaring it off, but unfortunately, in my lifetime I notice that government's way of "encouraging" is to penalize. So I oppose this because I do not for a minute believe the word "encourage" which starts the sentence in the example and I don't even see the word "encourage" in the actual legislation language.

Let the feds lead.

No new programs. Stop the subsidies for bad behavior, and the companies will change their behavior to match the free market.

How would this be watched. If the the EPA is run by natural gas executives how is this going to work?

Key words "cost-effective, achievable reductions"

individuals can only do so much with this issue, we need strong and numerous government action of many forms and formats...

Use Incentives -not permits

Look to the UN-intended consequences. Let the market do it's job. Like most government involvement in an issue, it is well intentioned, but will ultimately make the situation more cumbersome and expensive.

Sure, why not?

what are you going to do plug animals butt. considerIng how many animals that produce methane that is a lot of plugs

Since methane is such a potent greenhouse gas, this can have significant impact.

Are we talking Methane Gas? If so I am NOT in favor of it. We need to get away from fossil fuel development.

Support as long as the program is voluntary without blackmail by environmental groups.

"Encourage" sounds like a non-regulating and non-enforceable do-feel-good regulation.

Certainly we need to benefit from flared gases in some way.

The key wording is cost-effective.

Big business encouraged? Don't think it would work. Maybe, again, incentives. Permits might work.

What about incentives - permits are not incentives.

This would depend on what technology?

Voluntary participation only. Should not be a permit process.

Verification of participation and requirements through permits sound like new government programs to me. We do not need new permitting or verification. Leave it alone.

Sounds economically viable.

Methane is a valuable energy resource -- why vent or burn it? It's amazing that anyone still does this. Gas companies are not in the business of conserving. Address problem through carbon tax.

Encouragement - yes but you left the door open for requirements through permits - this is not right could the methane be captured and used to power something?

Encourage and verify?? Does this seem like opposites?

Cogeneration facilities using methane.

MORE

Methane is a resource! Why vent or burn it?

Would support only if the Natural Gas Star Program was voluntary. Actually more analysis should be spent on the methane created by refuse sites and sewer facilities. I don't think it is smart to think that the oil and gas industry is bad when there is NO regulation of methane releases from our Government and community owned sewer and garbage facilities. You should consider incentives to capture and use this gas like they are doing in Yellowstone County's landfill.

30% huh, can't we do better than that?

Who will pay for the program? What are the costs?

Artificial cost increase for no measurable gain.

30% is not enough. I think they need to reduce their emission even further though. I have seen first hand in SE Montana all of the venting and flaring going on in the oil and gas fields and it is staggering to see. Go take a tour around the Decker and Baker areas!!

With the prices rapidly increasing, conserving natural resources is a matter the free market can handle without government mandates.

Encourage and require should never be used in the same sentence.

This would remove Montana's ability to manage our own operations and remove power from the state legislature placing it in the hands of another VERY large bureaucracy. Ultimately costs would climb and the poor would be hit hardest.

there is 30 trillion cubic feet of coal base methane under s.e. montana, enough to power the U.S. for one hole year

All for unproven theories touted as facts.

This is absolutely an issue in Billings, where I live.

What cost-effective methods? Who is going to pay?

I would suggest that we demand, not encourage, participation. The goal should be higher.

This Action Plan was not a Montana grassroots Plan. It was the same plan written for California and other states. Montana's poor and middle class cannot pay any more for energy.

<http://www.righttalk.com/asx/ggws.aspx>

As we continue to strive to remove our dependency on foreign oil, it is amazing that these types of punitive measures come up. Mandates that restrict and cost the companies producing refined production is ultimately passed onto the consumer,.

What incentive out of the taxpayers pocket do you intend to offer here. Your goals are high and lofty, but it is not governments job. Please explain what article of the State Constitution CO2 Reduction fall under to give authority for such wide sweeping regulations. Fear of what Global Warming is not a great motivation. When over 400 prominent Scientist disagree with the "consensus" In fact, there are reports that CO2 is beneficial to plants, and animals. see

<http://uplink.space.com/printthread.php?Cat=&Board=environment&main=206078&type=post>

Restrict the standards to the point that it is not feasible to do business in Montana.

Only good with incentives, not permits.

Permits are just another name for more taxes. more requirements will drive the price up.

Require natural gas companies to end venting and flaring ASAP.

As long as we get a real benefit from this increased cost of this recommendation, it seems to make sense. I'm sure gasoline prices will only go up further than the already are.

Why doesn't the DEQ just shut down all businesses and go back to the Stone age as you are recommending with all these regulations.

Reduce methane emissions from Cattle Feedlots too.

AHHHHHH. LESS, NOT MORE GOVT>>>>>

I do not know enough about this recommendation to hold a serious opinion.

Why hasn't this been done all along??

raising costs of compliance

Absolutely not. Junk science driven legislation is absurd.

Of course. This question asks "should we be foolish, or shouldn't we?"

the private sector will do this without the government if it makes economic sense.

I like the idea of using a program, the permits program, that's already in place.

How about capturing and using methane waste from waste water treatment plants and landfills?

Yes, that will help. But let us look at other means for getting our needs taken care of as well. Finds ways for zero emissions.

Capture of methane produces more natural gas fuel and less GHG.

30% may be too aggressive within a short span of time.

Keep the language very clear.

Business as usual based on what business?

Our oil and gas production is already moving out of Montana because of low incentives to producers. This would send more business out of Montana.

Scientific theories on global warming do not warrant new taxes or legislation. Need additional analysis to understand impact on consumers and penalties on business development.

Too costly, no real science behind this.

"There are already requirements for venting and flaring and other safety practices in oil and gas operations. For well locations those regulations are under the Montana Board of Oil and Gas Conservation, and for refining operations the responsibility lies with the Department of Environmental Quality. Given the current price for natural gas there are already strong economic incentives to reduce venting and flaring. It is important to note that venting and flaring are also necessary safety procedures in certain situations and it is vital to have them as options. The MPA Board of Directors voted to endorse the EPA Natural Gas Star program at its November 2007 meeting. MPA endorsed the program because of the voluntary core principle of the program. Reporting and monitoring that is required by the Gas Star program are extensive and individual operators need to understand the benefits so they can judge the cost effectiveness of the program. MPA agrees with the concepts contained in the EPA Natural Gas St

As much as government is needed in a free society, a person with enough incentive to start and run a business will be reduced to a puppet in the hands of government. Government will dictate how you operate your business ... charge you for their assumed 'expertise', and tax you on your (their) profits. Nice plan for government.

The State should stay out of this. It is not a function of the State.

All of these are 'feel good' expensive bulls**t legislation. Global warming is NOT a fact (cold records set last winter in the southern hemisphere) so it might be Northern hemisphere warming, but not global. Secondly, latest studies of the sun spots (that control global temperatures more than humans) indicate that within 20 years we will be back in a 'mini-ice age'. Not politically correct, but MUCH more accurate.

Just quit burning it off at the oil fields.

Encourage? To participate? Does that mean campaign contributions? Sounds like it to me.

NO MORE REGULATIONS PLEASE!

First word should read REQUIRE Don't be nice to high-pollution industries

Is this a realistic goal and would it disadvantage Mt and Montanans?

please revert to my previous comment

This should be the number one goal. However, the allowed emission levels should be very near zero. Methane is a much more urgent problem than carbon.

Just more regulations.

Not interested in requiring permits.

Report helpful on this one...hard to judge unintended consequences, costs on these

"Encourage" should be "require" but even more importantly, natural gas is too valuable to burn up to generate power. In 50 years or so it will be gone!

cost? who will pay?

Encouragement is great.

Instead of flaring waste methane and other hydrocarbons, require it to be stored or used to generate electricity or provide space heating. Do not continue to waste these BTUs.

more money out of tax payers pockets, methane and CO2 are not the big problem with climate change. It's the other chemicals that no one can even pronounce nor does anyone ever talk about because the really bad stuff is hidden from the discussion in favor of fear mongering about CO2.

Some companies are already participating. Where does the 30% reduction figure come from?

Increase percentage and add aggressive date goal.

is this flat-out do this or do that? Would this result in higher market prices for us, consumers?

Establish time frame.

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This isn't such a big issue. Do you want to choke off the bonanza at Sidney? What's the matter with you people?

% should be higher!

No worded strongly enough. We should mandate this be done, not encourage.

Speaking of CO2 and methane emission, what do you want to do about burping and farting livestock in Montana?

no methane drilling!

encourage away

Absolutely

Methane is about 20 times worse than CO2 as a greenhouse gas

"encourage"??? how about "require"?

ANOTHER "FEEL GOOD" APPROACH--

"Encourage" and "possible requirements" insure no teeth in this.

Respondent does not have sufficient information or knowledge to rank this recommendation.

increased costs little benefit

That is not enough of a percentage reduction.

Use existing Energy Star program.

Another permitting process?

What about feedlot methane reductions? Research grant to state University.

again-teeth

there is climate change. But mans impact is limited. Maybe as little as less than 3-5% need cost benefit analysis

How about 90%?

The star program is a farce, a local refinery got the designation. Why, because the refinery runs sweet crude and therefore does not require the amount of energy a sour crude refinery uses. Of course the EPA is not smart enough to know this.

Should not be a priority...there are bigger issues.