

Alaska Oil and Gas Association



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Kara Moriarty, President & CEO

December 18, 2018

Commissioner Hollis French, Chair
Alaska Oil & Gas Conservation Commission
333 W. 7th Avenue
Anchorage, AK 99501
Submitted by E-Mail to: jody.colombie@alaska.gov

Re: Kate Troll Petition re: Non-Emergency Venting / Flaring.

Dear Commissioner French:

Please accept the following brief comments opposing Ms. Troll's petition regarding non-emergency venting and flaring. The Alaska Oil and Gas Association ("AOGA") is the professional trade association for the oil and gas industry, representing the majority of oil and gas exploration, production, refining and transportation companies in Alaska. In short, AOGA's membership endorses the Alaska Oil & Gas Conservation Commission's ("AOGCC") current regulation¹ regarding venting and flaring.

Ms. Troll's petition seeks to prevent all non-emergency venting and flaring, a suggestion which is not only impractical but also unsafe. As a best management practice, oil and gas operators use all reasonable precautions to prevent the waste of oil and gas resources. However, the venting or flaring of some natural gas is a practically unavoidable consequence of oil and gas development.

For example, during routine operations including, but not limited to, well drilling, production testing, and/or well purging, some gas that reaches the surface cannot be feasibly captured, used, or sold. When this occurs, the gas must either be combusted or released to the atmosphere. During normal production operations, as well volumes fluctuate or if there is an equipment failure, the production facility needs to have a safe place for all the excess volume of gas to be immediately relieved. Routine and continuous flaring of pilot and purge gas during non-emergency situations is a key component to the safe development of oil and gas reserves. Pilot and purge gas is continuously flared as part of the facility's safety design to safely ignite excess gas brought to surface during emergency situations such as process upsets, equipment failures, and emergency shut downs.

Flare systems are designed to the American Petroleum Institute's ("API") standards to maximize facility safety, and minimize flare gas volumes. Further, flaring, venting, and fugitive emissions by the oil and gas industry are currently regulated in Alaska by not only AOGCC, but also the Alaska Department of Environmental Conservation ("DEC"), Environmental Protection Agency ("EPA"), and

¹ See: 20 AAC 25.235.

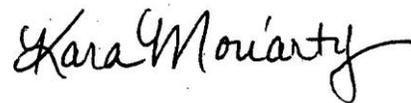
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the Bureau of Land Management (“BLM”) on federal leases. The combination of these current regulations ensure that all flaring or venting operations are done safely with minimal waste of resources.

Based on the foregoing, AOGA’s members endorse AOGCC’s regulation in its current form and respectfully request it remain unchanged.

Respectfully submitted,

A handwritten signature in black ink that reads "Kara Moriarty". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

KARA MORIARTY
President & CEO