

The Northern Europe upstream oil and gas industry supports the aim of the EU methane regulations

Offshore Norge, Dansk Offshore, Element NL, BVEG and Offshore Energies UK represent the upstream oil and gas sector in North Europe. We welcome and support the European Commission's objective to (i) improve the availability, quality, and reliability of global methane emission data, (ii) ensure that operational routines are put in place to minimize emissions and (iii) reduce imported emissions from international operators.

The methane emissions from upstream oil and gas activities are low, minimised due to the implementation of systems, processes and tools that target safety risks. Detecting methane leakages and repairing the leaks are a natural part of routine operations. The EU methane regulation will be a valuable tool for even further reducing the emissions in Europe of one of the most potent greenhouse gases, but it needs to ensure that each mandated activity will deliver the intended reductions. To this end, the regulation should be proportionate, practicable and achievable.

We refer you to the comments from IOGP. We would, however, like to highlight the following suggestions:

- Source specific **methane emission quantification**, performed in accordance with prevailing guidelines, is more reliable for annual emission reporting than instant measurements. The purpose of direct measurement should be to verify and improve quantification of methane emissions from oil and gas production; not replacing the engineering quantification methodologies.
- Extensive and high-frequency **Leak Detection and Repair (LDAR) surveys** of all relevant components regardless of the potential leak rate is not an effective way to reduce methane emissions. The frequency of LDAR surveys needs to be commensurate to potential leak rates and thus the potential contribution to emission reduction. The focus should be on detection technologies and actions that contribute most to reducing emissions.
- The scope of the regulations should be limited to **methane emissions directly to the atmosphere**.
- Installing measurement equipment at thousands of **inactive wells** will be disproportionate. The leak integrity of plugged and abandoned wells is already integrated in the national plugging requirements. Therefore, the definition of inactive wells should explicitly exclude permanently and temporarily plugged wells.

We welcome any opportunity to support this important work and deliver our shared goal to reduce methane emissions from oil and gas operations.

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