



December 17, 2018

U.S. Environmental Protection Agency,  
EPA Docket Center  
Docket ID No. EPA-HQ-OAR-2017-0483  
Mail Code 28221T  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**Attention: Docket ID No. EPA-HQ-OAR-2017-0483 – Oil and Natural Gas Sector:  
Emission Standards for New, Reconstructed, and Modified Sources Reconsideration:  
Proposed Rule (October 15, 2018).**

ExxonMobil supports federal regulatory standards to mitigate methane emissions for both new and existing source oil and gas facilities, and we encourage EPA to continue to pursue cost-effective regulations. In that regard, we support maintaining the key elements of the underlying regulation, such as leak detection and repair programs, enhanced pneumatic device standards, control requirements on regulated storage tanks, and reduced emission completions on new wells. We believe the correct mix of policies and reasonable regulations help reduce emissions, further supporting the benefits of natural gas in the energy mix.

ExxonMobil is committed to reducing methane emissions in our operations. We are continuing to work with industry peers, regulators, researchers and NGOs to identify cost effective emission control opportunities that provide environmental benefits and do not impact safety or hinder our ability to provide the energy our nation will continue to demand for many years to come. This commitment is reflected by:

- *ExxonMobil's Mitigation Program:* We established an enhanced methane control program in 2017 at our U.S. subsidiary XTO Energy Inc. that includes regular leak detection and repair surveys, a phase out of high bleed pneumatic devices, close monitoring of liquid unloadings, improved new facility designs, and associated training for operations management, superintendents, foremen, facility engineering personnel, and those involved in inspections. After six months, about two-thirds of ~1200 high bleed pneumatics were replaced and a reduction of close to 4 percent, or more than 7,200 metric tons of methane, was achieved through XTO's voluntary program and other operational improvements.

- *Decreasing Emissions:* Overall, we are pursuing initiatives that will result in a 15 percent decrease in company methane emissions by 2020. These initiatives include those at XTO Energy as well as efforts across global operations that focus on the most significant sources of methane.
- *Methane Guiding Principles:* In 2017 we joined seven other leading global oil and gas companies to found the Methane Guiding Principles (MGP), which include commitments to continuously reduce emissions, increase transparency, improve data accuracy, advocate for sound policies, and engage across the entire value chain. The initiative includes NGOs, academics, and international entities such as the International Energy Agency, the United Nations Environment Programme and the World Bank to strengthen global reach and impact, and MGP company membership has doubled.
- *Expanding Industry Efforts:* We were a founding member of the American Petroleum Institute's Environmental Partnership methane program which now has over 50 companies undertaking emissions mitigation efforts. This program also includes industry outreach and workshops where best practices and learnings can be shared. The partnership now represents about 30 percent of U.S. onshore oil and gas production.
- *Technology Innovation and Research:* We have a substantial research and technology development program, which includes partnering with government laboratories, universities, NGOs, and other industry participants. For example, we served as technical advisors to the Stanford University and Environmental Defense Fund's Mobile Methane Monitoring Challenge, and we recently formed a Collaboratory to Advance Methane Science (CAMS) with several other companies. The CAMS research consortium is hosted by the Gas Technology Institute and will advance methane science to better understand global emissions and the prospects for new solutions.

We appreciate EPA's efforts to make this comprehensive rule-making more cost-effective, encourage new leak detection technologies and maintain the overall methane emission reduction goals. We support the comments submitted by the American Petroleum Institute to further enhance the cost effectiveness of the rule while still maintaining the core focus on methane emissions reduction. We have gained considerable experience from our efforts, and would welcome the opportunity to discuss these comments with EPA and further share our views on the importance of reasonable regulations to manage methane emissions for both new and existing sources prior to the final rule.

We appreciate the opportunity to submit these comments to the rulemaking docket. ExxonMobil, and its subsidiary XTO Energy, is a leading oil and natural gas producer in the United States with expertise in developing tight gas, shale gas and unconventional oil resources. XTO or its affiliates operate in all major U.S. unconventional producing regions and Western Canada. XTO also provides support and technical services to

ExxonMobil's operations in Argentina. The company manages 11 million acres with a total resource base of about 33 billion oil-equivalent barrels.

To the extent EPA requires additional supporting information relative to these comments, or has any questions concerning this submittal, please contact Matthew Kolesar at 832-625-0042 or at [matthew\\_kolesar@xtoenergy.com](mailto:matthew_kolesar@xtoenergy.com).

Regards,



Gantt Walton  
Vice President, Washington Office