



TOTAL WASHINGTON DC REPRESENTATIVE OFFICE, LLC

Submitted via Regulations.gov and mail

November 22, 2019

U.S. Environmental Protection Agency
EPA Docket Center
Attention Docket ID No. EPA-HQ-OAR-2017-0757
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Comments of TOTAL on Proposed Rule: Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review (84 Fed. Reg. 50244)

Dear Administrator Wheeler,

TOTAL appreciates this opportunity to submit comments on EPA's proposed action to amend oil and natural gas sector new source performance standards related to the regulation of the transmission and storage segment and requirements for controlling methane emissions. TOTAL respectfully opposes the proposed action as we believe federal methane performance standards for facilities across the gas value chain are a useful tool to limit greenhouse gas emissions in order to mitigate the risks associated with global climate change.

TOTAL is the fourth-largest international oil and gas major based on sales. We operate in more than 130 countries and are a key player in the U.S. where we operate in 23 states and employ more than 7,500 employees. We provide a full range of energy solutions in the U.S. - natural gas, oil and low-carbon electricity (renewables, solar in particular, and gas based) - and we expect to be, by the end of 2020, the largest exporter of U.S. LNG.

TOTAL's more than 100,000 employees, diverse shareholder base, and community partners are all united behind one collective ambition: to become the responsible energy major. In pursuit of that ambition, TOTAL has been a leader in integrating climate-related risks and opportunities into its strategy, setting ambitious goals for energy efficiency and emission reductions.

Despite TOTAL's extensive operations in the U.S. and its demonstrated commitment to environmental stewardship, it is a remarkably rare event in which we feel compelled to comment, on an individual basis, on an EPA rulemaking proceeding. But in this instance, EPA's proposed action has the potential to undermine the significant actions that TOTAL and others are taking to address the risks associated with global climate change.

Of the many actions TOTAL takes to integrate climate risks and opportunities into its strategy, controlling methane emissions plays a key role. TOTAL is present throughout the entire gas value chain, from production to end customer, as it recognizes the significant advantages offered by natural gas to reduce greenhouse gas emissions. Natural gas emits half the greenhouse gases of coal in power generation and is a natural partner to renewable energies, to both offset their intermittent nature and handle seasonal demand fluctuations. But to preserve these advantages, we must strictly control methane emissions. Methane is indeed a powerful greenhouse gas with a global warming potential that, according to IPCC¹, is 25 times more potent than carbon dioxide over a 100-year time span.

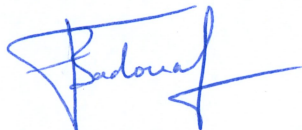
TOTAL has therefore taken cost-effective actions to detect and reduce methane emissions, by decreasing flaring and venting as well as developing inspection and maintenance systems. In 2018, TOTAL's methane emissions from its upstream operated facilities were kept below 0.25% of the commercial gas produced², one of the best rates in the industry. Our target is to sustainably reduce this emission intensity below 0.20% by 2025³. To progress on these matters, Total is working with industry peers through partnerships such as the Oil and Gas Methane Partnership, from the Climate and Clean Air Coalition, the Methane Guiding Principles or the Oil and Gas Climate Initiative.

We believe EPA should seize the opportunity to align U.S. regulations with proven, reasonable strategies to reduce methane emissions. This would foster innovation and incentivize companies to take action. It would also maintain the US in a leading position in terms of standards and practices in the Oil and Gas sector, encouraging other countries, often commercial partners, to follow suit.

TOTAL hopes the agency finds these comments useful. TOTAL generally supports EPA's efforts to simplify its rules and eliminate redundancies. However, in this instance, we believe the risk of eliminating key provisions of the oil and gas sector rules presents a substantial risk to our companies' efforts to reduce methane emissions and address climate change.

As always, TOTAL welcomes the opportunity to further discuss EPA's plans for controlling greenhouse gas emissions, including a discussion of the methods and systems TOTAL has developed to be successful in doing so.

Sincerely,



François Badoual
President & CEO, TOTAL Washington D.C. Representative Office

¹ IPCC Fourth Assessment Report, 2007.

² As measured in accordance with OGCI methodology for methane intensity calculations.

³ Integrating Climate Into our Strategy,

https://www.total.com/sites/default/files/atoms/files/total_rapport_climat_2019_en.pdf