ExxonMobil Submission for Methane Emissions Stakeholder Meeting (June 9, 2020)

ExxonMobil supports the development of reasonable and cost-effective regulations addressing oil and gas related methane emissions. While voluntary efforts by individual companies are important, they only capture a fraction of industry's overall emissions. Full industry participation is required to maximize the benefits to society. We are committed to methane reductions in our operations and across industry, and our operational experience informs our perspectives on policy, regulations and technology development.

We appreciate the opportunity to make this submission contributing to the Commission's methane emissions strategy initiative and are available for further dialog with the Commission to provide information or clarity on any aspect raised below.

Methane emission reductions in our operations: As of year-end 2019, we have reduced methane emissions by nearly 20 percent in our U.S. unconventional operations compared to 2016 levels, and we remain on track to meet our corporate-wide commitments to reduce methane emissions by 15 percent and reduce flaring by 25 percent by year-end 2020. Our successful voluntary methane management program includes structured leak detection and repair protocols, prioritized replacement of high-bleed pneumatic devices, technology enhancements to infrastructure and substantial data gathering and research.

Regulation addressing oil & gas related methane emissions: ExxonMobil believes the correct mix of emission-reduction technologies, policies and appropriate regulations can help efficiently reduce emissions. In this regard, in March 2020, we introduced a model framework for industry-wide methane regulations and urged stakeholders, policymakers and governments to develop comprehensive, enhanced rules to reduce methane emissions in all phases of production.

This framework is the product of intensive study and implementation of controls for the major sources of methane emissions in our own operations. Notably, it builds on the actual mitigation measures that ExxonMobil has been applying to our operations as noted above, resulting in improvements that demonstrate what's practicable and achievable. We hope this framework is helpful to companies as they curb their own emissions and for governments to consider as they develop methane regulations.

Technology Development: We also continue to undertake extensive research to understand methane emissions sources, and help develop and test new detection and mitigation technologies. We are helping to identify the best performing and most efficient technologies – including satellite instruments – that can be adopted by all producers to detect, repair and accurately measure methane.

However, no one-size-fits-all solution exists. For this reason, ExxonMobil is leading testing for the most promising next-generation methane detection technologies at 1,000 sites in two U.S. states, Texas and New Mexico, with the aim of identifying effective, scalable solutions. Additionally, we also just announced a new collaboration involving universities, environmental groups and other industry partners. Called "Project Astra," the effort is focused on developing an innovative sensor network to continuously monitor methane emissions across large areas to enable quick and efficient detection and repair of leaks. If successful, the project could provide a more affordable, efficient solution to reduce methane emissions.

We believe these efforts show great promise in developing new technologies that could improve fugitive methane emissions detection and mitigation in the near future.