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PureWest comments on Phase 3 Gas Data

Please find our comments attached. Thank you.

Additional submitted attachment is included below.



1550 Wynkoop Street, Suite 300
Denver, CO 80202

February 3, 2026

Max Solanki
California Energy Commission (CEC)
715 P Street
Sacramento, CA 95814

Re: PureWest Energy comments on Phase 3 Natural Gas and Renewable Natural Gas Data Collection

Dear Mr. Solanki:

PureWest Energy (PureWest) appreciates the opportunity to comment on the proposed changes to Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection. PureWest encourages CEC to take steps through this rulemaking and others to highlight opportunities to reduce greenhouse gas (GHG) emissions associated with California’s natural gas supplies through the use of verified low-carbon gas. We urge you to coordinate efforts directly with the California Air Resources Board (CARB), California Public Utilities Commission (CPUC), Department of General Services (DGS) and other relevant agencies to increase access to verified low-carbon gas and support the state’s energy priorities.

About PureWest Energy

PureWest Energy is an independent natural gas company focused on development in the U.S. Rockies, with current operations in the Pinedale Anticline and Jonah Field in Southwest Wyoming. We are dedicated to advancing modern life by responsibly delivering essential energy with exceptional reliability and proven environmental stewardship. We strive to go beyond the expected to produce natural gas in the most responsible and efficient manner possible.

PureWest’s commitment to stakeholders includes exceptional safety performance, an employee led community investment program, and industry leading emissions mitigation focused on rigorous Measurement, Monitoring, Reporting and Verification (MMRV) with ISO 14067 alignment. The MMRV framework is comprehensive, utilizing robust data to enable greater transparency and accountability for GHG emissions. In 2024, PureWest had a methane intensity rate of 0.13%,¹ well below the industry average and thresholds set in the Inflation

¹ <https://purewest.com/wp-content/uploads/2025/10/PureWest-2024-Corporate-Responsibility-Report-Final.pdf>

Reduction Act that would have reduced average methane intensity from natural gas production by about 80%.

Verified Low-Carbon Gas Offers Significant Opportunity for California

California is a leader in detecting and mitigating methane emissions, including from the petroleum and natural gas sector. However, according to CEC data,² more than 90 percent of California's natural gas supplies come from out of state, which is responsible for more fugitive methane emissions than all oil and gas production, transmission and distribution operations in California.³ CARB's Short-Lived Climate Pollutant Reduction Strategy recognizes that more can be done to maximize the environmental benefits associated with natural gas supplying the state.⁴

Reducing methane emissions from petroleum and natural gas production is one of the most cost effective climate strategies available, because avoided methane emissions equates to additional gas that is captured and sold. Accordingly, best practices related to minimizing methane emissions and MMRV are widely – but not universally – deployed in the market today.

We encourage the CEC and other state agencies to take steps to ensure continued progress in utilizing best practices to reduce methane emissions from the state's natural gas supplies. In particular, as you finalize and implement the Phase 3 Gas Data Collection, we urge you to:

- Coordinate with CARB related to implementation of the state's climate programs and natural gas emissions accounting programs, including pursuant to AB 1496 and AB 2195, in order to support more robust accounting of emissions associated with natural gas use in California and identify opportunities to support the use of verified low-carbon gas.
- Consider allowing and encouraging producers of verified low-carbon gas, with an emissions intensity verified to be below 0.2% through established MMRV protocols, to report on production and use of verified low-carbon gas, similar to proposed reporting requirements for renewable natural gas plants.
- Through future Integrated Energy Policy Reports and other efforts, highlight opportunities to further reduce emissions associated with the state's natural gas use in

² <https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california>

³ According to CARB estimates, out-of-state GHG emissions from releases of uncombusted gas and flaring associated with natural gas consumed in California accounted for 7.2 MMTCO₂e in 2023, while in-state fugitive emissions from oil and gas production and processing and natural gas transmission and distribution amounted to a total of 5.2 MMTCO₂e in 2023.

https://ww2.arb.ca.gov/sites/default/files/2025-12/AB%202195%20Out-of-State%20Natural%20Gas%20Emissions%20Report_2018-2023.pdf

https://ww2.arb.ca.gov/sites/default/files/2025-11/nc-ghg_inventory_scopingplan_sum_00-23_CH4.xlsx

⁴ https://ww2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf

buildings, the power sector, and other end uses through the use of verified low-carbon gas.

- Coordinate with DGS, CPUC, CARB, utilities and others to identify cost-effective opportunities to increase access to verified low-carbon gas for California residents and businesses and further reduce emissions associated with state buildings and operations.

Thank you again for the opportunity to comment on this proceeding. We look forward to working with you to increase access to transparent data regarding California's natural gas supplies in order to better inform the state's energy planning.

Thank you,

A handwritten signature in blue ink that reads "Kelly Bott". The signature is written in a cursive, flowing style.

Kelly Bott
Senior Vice President, ESG, Land and Regulatory
PureWest Energy