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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**In the Matter of the Application of Enbridge
Gas Utah for Approval of the Piceance III
Properties as a Wexpro II Property**

Docket No. 26-057-16

PRE-FILED DIRECT TESTIMONY OF DAVID R. LYON, PH.D.

ON BEHALF OF

UTAH CLEAN ENERGY AND THE ENVIRONMENTAL DEFENSE FUND

**APPLICATION OF ENBRIDGE GAS UTAH FOR APPROVAL OF THE PICEANCE III
PROPERTIES AS A WEXPRO II PROPERTY**

OCTOBER 13, 2026

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XVII. INTRODUCTION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Dr. David Lyon. My business address is 2060 Broadway St, Ste 300 Boulder, Colorado 80302.

Q. By whom are you employed and in what capacity?

A. I am employed by Environmental Defense Fund (hereinafter “EDF”), a non-profit public interest organization whose mission is to stabilize the climate, strengthen the ability of people and nature to thrive and support people's health. At EDF, I serve as a Senior Methane Scientist II and work on science and policy related to the measurement and mitigation of methane emissions from the oil and gas industry.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of Utah Clean Energy (hereinafter “UCE”) and EDF.

Q. Please review your professional experience and qualifications.

A. I have over 15 years of experience working on methane emissions from the oil and gas industry, including emissions inventory development, managing measurement-based research studies, evaluating technologies for leak detection and quantification, and advising regulatory and voluntary programs to reduce methane emissions. I earned my Ph.D. in Environmental Dynamics in 2016 with my dissertation research on oil and gas super-emitters. I have worked for Environmental Defense Fund since 2012, with the exception of 2023 – 2024, where I worked a year each at the United States Environmental Protection Agency (hereinafter the “US EPA”) and University of Texas. At US EPA, I was a special advisor for the implementation of the Methane Emissions Reduction Program and helped with the development of financial assistance for methane mitigation and revisions

to the Greenhouse Gas Reporting Program. At the University of Texas, I worked as a Senior Research Scientist at the Energy Emissions Modeling and Data Lab (hereinafter “EEMDL”), an industry-funded research group providing reliable, science-based, transparent, and measurement-based greenhouse gas emissions assessments of global oil and gas supply chains. I have authored and co-authored over 30 papers on oil and gas methane emissions and given dozens of presentations on the topic.¹ I have provided testimony in several state hearings including in Colorado and New Mexico and have testified twice to U.S. Congressional committees on oil and gas methane emissions.

Q. Can you provide hyperlinks to your scientific publications that you reference here in your testimony?

A. I cite the following publications in my testimony, and note that they are all available in the public domain at the following links:

- Alvarez, A. Ramon, Pacala, W. Stephen, Winebrake, J. James, Hamburg, P. Steven, (2012) "Greater focus needed on methane leakage from natural gas infrastructure." PNAS. 109 (17) 6435-6440. <https://doi.org/10.1073/pnas.120240710>
- Center for Energy and Environmental Systems Analysis. (n.d.). Advanced methane initiatives (AMI). University of Texas at Austin. <https://www.ceesa.utexas.edu/ami>
- Center for Energy and Environmental Systems Analysis. (n.d.). openGHGRP. The University of Texas at Austin. <https://www.openghgrp.com/>
- Climate Program Portal. (2025, February 6). Climate and economic justice screening tool (CEJST). <https://climateprogramportal.org/resource/climate-and-economic-justice-screening-tool-cejst/>
- Colorado Department of Public Health and Environment. (n.d.). Greenhouse gas intensity program. <https://cdphe.colorado.gov/apcd-ghg-intensity-program>
- Enbridge Inc. (2026). 2025 sustainability report (p. 21-24). https://www.enbridge.com/~/_media/Enb/Documents/Reports/Sustainability-Report-2025/Enbridge_SR_2025.pdf
- Environmental Defense Fund. (2026, September 18). Colorado becomes first state to fully adopt the 2024 EPA methane standards. <https://www.edf.org/media/colorado-becomes-first-state-fully-adopt-2024-epa-methane-standards>

¹ <https://scholar.google.com/citations?user=Y32HsP0AAAAJ&hl=en>

- Environmental Defense Fund. (2023, October). Utah methane waste and pollution factsheet. <https://www.edf.org/sites/default/files/2023-10/Utah%20Methane%20Waste%20and%20Pollution%20Factsheet.pdf>
- European Parliament & Council of the European Union. (2024). Regulation (EU) 2024/1787 of the European Parliament and of the Council of 13 June 2024 on the reduction of methane emissions in the energy sector and amending Regulation (EU) 2019/942. Official Journal of the European Union. <https://eur-lex.europa.eu/eli/reg/2024/1787/oj/eng>
- Helmig, D., Thompson, C. R., Evans, J., Boylan, P., Hueber, J., & Park, J.-H. (2014). "Highly elevated atmospheric levels of volatile organic compounds in the Uintah Basin, Utah." *Environmental Science & Technology*, 48(9), 4707–4715. <https://doi.org/10.1021/es405046r>
- Intergovernmental Panel on Climate Change. (2023). Summary for policymakers. In Climate change 2023: Synthesis report. <https://doi.org/10.59327/IPCC/AR6-9789291691647.001>
- Intergovernmental Panel on Climate Change. (2014). *Climate change 2014: Synthesis report*. https://www.ipcc.ch/site/assets/uploads/2018/02/SYR_AR5_FINAL_full.pdf
- Lin, C. John, Bares, Ryan, Fasoli, Benjamin, Garcia, Maria, Crosman, Erik, Lyman, Seth (2021). "Declining methane emissions and steady, high leakage rates observed over multiple years in a western US oil/gas production basin." *Scientific Reports* 11, Article 22291. <https://doi.org/10.1038/s41598-021-01721-5>
- Lyon, D. R. (n.d.). *Google Scholar profile*. Google Scholar. <https://scholar.google.com/citations?user=Y32HsP0AAAAJ&hl=en>
- Malcombe, Paul, Speirs, F. Jamie, Brandon, P. Nigel, Hawkes, D. Adam, (2018) "Methane emissions: choosing the right climate metric and time horizon" *Environ. Sci.: Processes Impacts* 20(10) 1323–1339. <https://doi.org/10.1039/c8em00414e>
- Mar, A. Kathleen, Unger, Charlotte, Walderdorff, Ludmila, Butler, Tim (2022). "Beyond CO2 equivalence: The impacts of methane on climate, ecosystems, and health." *Environmental Science & Policy*. 134 127-136. [10.1016/j.envsci.2022.03.027](https://doi.org/10.1016/j.envsci.2022.03.027)
- Oil and Gas Climate Initiative. (n.d.). Oil and Gas Climate Initiative. <https://www.ogci.com/>
- The Oil & Gas Methane Partnership 2.0. (n.d.). The Oil & Gas Methane Partnership 2.0 (OGMP 2.0). <https://www.ogmpartnership.org/>
- Wyoming Legislature. (2026). Energy product reclassification and sovereignty act (House Bill 0120). <https://www.wyoleg.gov/Legislation/2026/HB0120>

Q. Have you previously filed testimony before regulatory or legislative bodies?

- Yes, including the Colorado Air Pollution Control Division and U.S. House of Representatives Committee on Science, Space, and Technology.

XVIII. PURPOSE AND SUMMARY OF TESTIMONY

Q. What is the purpose of your testimony?

- A. The purpose of my testimony is to provide data and recommendations on how Enbridge Gas could report and mitigate methane emissions from the Piceance III properties if the Application is approved. My testimony does not include an assessment of whether the Application should be approved.

Q. Why are UCE and EDF submitting testimony on this topic?

- A. UCE and EDF are concerned that, if the Application is approved and Enbridge Gas does not commit to measurement-based reporting and mitigation of the Piceance III properties, that the excess methane emissions and co-pollutants could adversely impact climate change and human health.

Q. Why is this important?

- A. The Commission's obligation is to determine whether the transaction is in the public interest of Utah customers. This testimony demonstrates the harms that will affect Utah customers with the proposed acquisition of the Piceance III properties if emissions are not mitigated. The acquisitions will affect Utah customers, as greenhouse gases are a global pollutant and will exacerbate the effects of climate change, even though the Piceance III properties are located in Colorado. Moreover, regional co-pollutants may affect Utah customers.

Q. Please summarize your conclusions and recommendations.

- A. The Colorado-based Piceance III properties currently are subject to federal and state reporting of greenhouse gas emissions including methane. Based on reported data described in detail below, the properties have a methane intensity of approximately 0.37% of produced natural gas. If Enbridge Gas acquires the properties, it should continue to

report greenhouse gas emissions. If for any reason, including federal regulatory changes, Enbridge Gas is no longer able to report emissions to the federal Greenhouse Gas Reporting Program (GHGRP), then Enbridge Gas should voluntarily report the properties' emissions to the equivalent open GHGRP program managed by the University of Texas. Second, Enbridge Gas should report the properties' emissions to the Colorado Department of Public Health and the Environment using an operator-specific, measurement-based inventory. Third, Enbridge Gas should join the Oil and Gas Methane Partnership 2.0, a voluntary reporting program that currently covers 40% of global oil and gas production. Finally, Enbridge Gas should commit to reducing the methane intensity of natural gas produced from the Piceance III properties to 0.2% or less. Reducing emissions to a $\leq 0.2\%$ methane intensity is achievable with current technologies, especially after the implementation of measurement-based emissions reporting, which can help prioritize sources for cost-effective mitigation. If the Commission approves the Application, it should condition its approval on requirements such as those described in this testimony. To the extent that I do not address a specific issue, position, or proposal does not signify my agreement or disagreement with that issue, position, or proposal.

XIX. ENBRIDGE GAS MUST ACCURATELY AND THOROUGHLY REPORT ITS GHG EMISSIONS TO UTAH REGULATORS

Q. Can you explain why methane emissions are an important target for greenhouse gas emissions management?

A. Greenhouse gases trap heat in Earth's atmosphere, causing the Earth's surface to generally warm and alter the climate that humans and all life depend on. The current and future

impacts of human-caused climate change are well documented.² Methane (CH₄) and carbon dioxide (CO₂) are two of the most potent greenhouse gases that humans release. Of the additional heat trapped by human-released greenhouse gases so far, CO₂ is responsible for 0.8°C and CH₄ is responsible for 0.5°C.³

Methane and CO₂ differ in how long they spend in the atmosphere. This is because the amount of heat trapped in the atmosphere by these gases is a function of two factors: the concentration of the gas in the atmosphere, and its heat absorption per pound of gas. The gas absorption per pound of gas is well known by laboratory measures, and the heat absorption per pound of CH₄ is higher for methane than for CO₂. The concentration of a gas in the atmosphere depends on the total emission rate from all sources and how quickly the gas leaves the atmosphere by the Earth's various sinks. Methane persists only about 10 years in the atmosphere before being degraded by atmospheric chemistry processes. In contrast, CO₂ spends about 100 years in the atmosphere before being taken up by plants or stored in oceans. This causes a pound of CH₄ to have approximately 28 times the warming potential of a pound of CO₂ over a 100 year time frame, but 84 times the warming potential over 20 years.⁴

Since CH₄ has a shorter lifetime in the atmosphere and is also more potent, a reduction in methane emissions will rapidly lead to a reduction in the rate of global warming.⁵ In short, mitigating CH₄ will lead to a near-term amelioration of climate change impacts that will adversely affect the citizens of Utah.

As climate scientists have studied the potential for CH₄ emissions reductions to have a

² https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf

³ https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_SPM.pdf

⁴ https://www.ipcc.ch/site/assets/uploads/2018/02/SYR_AR5_FINAL_full.pdf

⁵ <https://pubs.rsc.org/en/content/articlehtml/2018/em/c8em00414e>

more immediate effect on climate, industry and policymakers have pushed for a greater focus on reducing CH₄ emissions from oil and natural gas facilities.⁶ Methane is the primary constituent of natural gas; therefore, oil and gas companies often can increase their natural gas production and revenue by capturing methane that otherwise would have been emitted to the atmosphere.

Q. Can you explain why methane emissions are an important target for greenhouse gas emissions management for the region?

- A. As a major producer of oil and gas, the western United States should prioritize mitigating oil and gas methane emissions to cost-effectively reduce greenhouse house gas emissions and increase the efficiency of oil and gas production. The States of Colorado and Wyoming, despite having very different political leadership, have both taken important steps to reduce oil and gas CH₄ emissions. In September, Colorado became the first state to fully adopt the US EPA 2024 methane standards, continuing their internationally leading efforts in methane mitigation. A 2025 EDF analysis of satellite data found that Colorado reduced methane emissions from its oil and gas sector by nearly 70% between 2010 and 2017.⁷ Wyoming includes several operators such as Jonah Energy that have joined the Oil and Gas Methane Partnership (hereinafter “OGMP”) 2.0 and publicly released data about their methane quantification and mitigation efforts. In 2026, the State of Wyoming enacted the Energy Product Reclassification and Sovereignty Act, which establishes voluntary gold standard certificates in designated areas for natural gas produced with a maximum CH₄ intensity of 0.2 percent.⁸

⁶ <https://www.sciencedirect.com/science/article/pii/S1462901122001204> and also <https://www.pnas.org/doi/10.1073/pnas.1202407109>

⁷ <https://www.edf.org/media/colorado-becomes-first-state-fully-adopt-2024-epa-methane-standards>

⁸ <https://www.wyoleg.gov/Legislation/2026/HB0120>

Q. Can you explain why methane emissions are an important target for greenhouse gas emissions management for Utah?

A. Scientific studies have found very high methane intensity in Utah’s Uinta Basin – a 2021 paper estimates that the CH₄ intensity in the basin remained steady at 6 – 8% of natural gas production between 2015 and 2020.⁹ In addition to CH₄, Utah oil and gas facilities emit hazardous air pollutants and VOCs that can contribute to ground-level ozone formation and negatively impact human health.¹⁰ In October 2024, the Utah Department of Environmental Quality was awarded a ~\$75M Climate Pollution Reduction Grant from US EPA to reduce the state’s GHG emissions, which includes funding oil and gas tank thief hatch replacement program in the Uinta Basin to reduce methane emissions. As stated in the grant workplan, reducing methane and co-pollutant emissions in the basin is important for reducing wintertime ozone concentrations and exceedances of the National Ambient Air Quality Standards.¹¹

Q. Please explain how toxic co-pollutants from natural gas facilities affect environmental justice communities in Utah.

A. A 2023 peer-reviewed study that I co-authored found that, in Utah in 2016, air pollution from the oil and gas industry was responsible for 8 deaths per million and 1,040 asthma exacerbations per million among children.¹² Utah’s oil and gas facilities are located near environmental justice communities, including tribal members and other disadvantaged people.¹³ Reducing methane emissions from oil and gas facilities such as those in the

⁹ <https://www.nature.com/articles/s41598-021-01721-5>

¹⁰ <https://doi.org/10.1021/es405046r>

¹¹ <https://deq.utah.gov/daq/beehive-emission-reduction-plan>

¹² <https://iopscience.iop.org/article/10.1088/2752-5309/acc886>

¹³ <https://climateprogramportal.org/resource/climate-and-economic-justice-screening-tool-cejst/>

Piceance Basin will reduce the exposure of environmental justice communities to toxic co-pollutants.¹⁴

Q. Please explain where Enbridge Gas must report emissions data collected for the Piceance III Properties.

- A. The Piceance III properties are based in the State of Colorado and currently are operated by Laramie Energy, LLC, which reports emissions data to both the US EPA and Colorado Department of Public Health and the Environment (CDPHE).

Q. Please explain the current methane intensity of the Piceance III Properties.

- A. For the US EPA Greenhouse Gas Reporting Program Subpart W, Laramie Energy's Piceance Basin onshore production assets reported 2023 emissions of 7,138 metric tons (MT) CO₂ and 3,094 MT CH₄. Based on their Subpart W reported emissions and natural gas production of 43,421,012 Mcf, Laramie Energy's produced natural gas has an intensity of 0.37% (Mcf CH₄ emitted / Mcf natural gas produced). For CDPHE's Oil and Natural Gas Annual Emission Inventory Reporting (ONGAEIR), Laramie Energy reported emissions of 173,412, 169,721, and 168,129 MT CO₂ and 1,094, 908, and 1,009 MT CH₄ emissions in 2023, 2024, and 2025, respectively. Laramie Energy's greenhouse gas intensity in 2023 was 11.57 MT CO₂E kBOE⁻¹, lower than CDPHE's 2030 target of 21.38 MT CO₂E kBOE⁻¹. Based on the data reported to CDPHE, Laramie Energy's 2023 methane intensity is ~0.13%. The discrepancy between the reported emissions is due to differences in reporting methods. For their 2026 State Default Intensity Verification Factor Report,¹⁵ CDPHE determined that measurement-based GHG emissions in the 3-county West Slope

¹⁴ <https://www.edf.org/sites/default/files/2023-10/Utah%20Methane%20Waste%20and%20Pollution%20Factsheet.pdf>

¹⁵ <https://cdphe.colorado.gov/apcd-ghg-intensity-program>

region are 2.7 times higher than ONGAEIR reported emissions. If this correction factor is applied to Laramie Energy's reported methane emissions, then their methane intensity is 0.35%, similar to the GHGRP based intensity.

Q. Is Enbridge Gas currently reducing the methane intensity of their other natural gas facilities?

- A. Enbridge's 2025 Sustainability Report declares that their methane emissions more than doubled from 2023 to 2024 due to the acquisition of three U.S. utilities, but the GHG intensity (CH₄ and CO₂ emissions) of their delivered gas has dropped from 12.83 to 11.49 kg CO₂E GJ⁻¹ between 2022 and 2025.¹⁶

Q. What is Enbridge Gas's stated position on methane emissions?

- A. In their 2025 Sustainability Report, Enbridge describes their target to reduce their GHG intensity 35% from 2018 levels by 2030 and achieve net-zero emissions from their operations by 2050. The report mentions several efforts Enbridge has undertaken to quantify and mitigate their methane emissions, including evaluating new methane leak detection technologies, replacing unprotected steel pipe with lower emitting plastic, detecting and repairing leaks, reducing venting before pipeline repairs, choosing alternative repair methods, and reducing other small sources of venting. The report indicates that Enbridge joined the International Petroleum Industry Environmental Conservation Association and ONE Future Coalition to help improve their environmental performance, but decided against joining the Oil and Gas Methane Partnership 2.0.¹⁷

¹⁶ https://www.enbridge.com/~media/Enb/Documents/Reports/Sustainability-Report-2025/Enbridge_SR_2025.pdf

¹⁷ https://www.enbridge.com/~media/Enb/Documents/Reports/Sustainability-Report-2025/Enbridge_SR_2025.pdf

**XX. MITIGATING METHANE EMISSIONS FROM THE PICEANCE III PROPERTIES
WILL BENEFIT UTAH RATEPAYERS**

Q. Are other companies reducing methane intensity from their natural gas facilities?

- A. Yes, many companies have committed to reducing CH₄ emissions and are implementing actions to reduce their methane intensity. There also are several regulations and voluntary programs that incentivize CH₄ mitigation. OGMP 2.0, a voluntary initiative that covers 40 percent of global oil and gas production, uses the 0.2 percent CH₄ intensity goal set by the Oil and Gas Climate Initiative¹⁸ as their benchmark target.¹⁹ In addition to reducing climate change impacts, lower CH₄ intensity natural gas may open new markets and/or sell at a premium. For example, natural gas imported to Europe will be required to comply with the European Union Methane Regulation,²⁰ which will set a minimum methane intensity and reporting requirements.

Q. Please explain how Enbridge can reduce methane intensity for the Piceance III Properties.

- A. Enbridge Gas should commit to several actions to facilitate methane mitigation and reduce their natural gas methane intensity. First, they should continue reporting GHGRP emissions from the Piceance III properties. If EPA repeals or delays GHGRP reporting, then Enbridge Gas should report to openGHGRP, a University of Texas managed, voluntary reporting system based on GHGRP Subpart W.²¹ Second, for the Colorado-based Piceance III properties, Enbridge Gas should implement an operator-specific, measurement-based

¹⁸ <https://www.ogci.com/>

¹⁹ <https://www.ogmpartnership.org/>

²⁰ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401787&pk_campaign=todays_OJ&pk_source=EURLEX&pk_medium=X&pk_keyword=energy_sector&pk_content=Regulation&pk_cid=EURLEX_todaysOJ

²¹ <https://www.openghgrp.com/>

inventory to report to CDPHE instead of estimating emissions with default ONGAEIR methods.²² This will result in a better understanding of emissions and allow CDPHE to directly use the operator’s measurement-based estimates rather than adjusting reported emissions with the state default intensity verification factor (2.7 for the West Slope in 2026). Third, Enbridge Gas should reconsider joining OGMP 2.0, which includes several utilities and can aid in estimating emissions with measurement-based approaches. Finally, Enbridge Gas should apply the information they learn from developing measurement-based inventories to prioritize mitigation efforts. This could include learning that previous emission reports may have overestimated some sources (e.g., pneumatic controllers), while underestimating others (e.g., storage tanks). Additionally, emission detection and quantification technologies such as aerial remote sensing can help identify large, “super-emitter” sources, which may be intermittent and not detected during traditional leak detection surveys. By using measurements to understand their emissions, Enbridge can determine cost-effective approaches for reducing the CH₄ intensity of their natural gas to less than or equal to 0.2 percent. A methane intensity less than 0.2% of produced natural gas is easily achievable – the Appalachian Methane Initiative 2025 report estimates that the average loss rate from unconventional wells in Pennsylvania is 0.09%, less than half of the 0.2% target.²³

XXI. CONCLUSION AND RECOMMENDATIONS

Q. Please summarize your recommendations.

A. To summarize:

²² <https://cdphe.colorado.gov/apcd-ghg-intensity-program>

²³ <https://www.ceesa.utexas.edu/ami>

- First, Enbridge Gas should continue reporting GHGRP emissions from the Piceance III properties. If EPA repeals or delays GHGRP reporting, then Enbridge Gas should report to openGHGRP, a University of Texas managed, voluntary reporting system based on GHGRP Subpart W.
- Second, for the Colorado-based Piceance III properties, Enbridge Gas should implement an operator-specific, measurement-based inventory to report to CDPHE instead of estimating emissions with default ONGAEIR methods.
- Third, Enbridge Gas should reconsider joining OGMP 2.0.
- Finally, Enbridge Gas should apply the information learned from developing measurement-based inventories to prioritize mitigation efforts and reduce their methane intensity to <0.2% of produced natural gas.

Q. Does that conclude your testimony?

A. Yes

I have read this filing and believe that it is supported in fact and in law.

DATED this 13th day of October, 2026.

Lauren Barros Law

/s/ Lauren. R. Barros

Lauren R. Barros

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CERTIFICATE OF SERVICE

I CERTIFY that on October 13, 2026, a true and correct copy of the foregoing was delivered upon the following via e-mail:

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