



OFFICE OF AIR QUALITY PLANNING AND STANDARDS
RESEARCH TRIANGLE PARK, NC 27711

October 14, 2025

Dr. Asa Carre-Burritt
Bridger Photonics, Inc.
2310 University Way, Bldg. 4-4
Bozeman, MT 59715

Dear Dr. Carre-Burritt:

We are writing in response to your request on behalf of Bridger Photonics, Inc. dated June 20, 2025, along with additional correspondence dated August 19, 2025 and September 8, 2025. Bridger Photonics, Inc. is located in Bozeman, Montana. In that request, the company is requesting an update to Bridger Photonics' existing "Alternative Test Method for Methane Detection Technology" under the 40 CFR part 60, Subpart OOOOb – Performance Standards for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced after December 6, 2022 (Subpart OOOOb). EPA is considering this request under 40 CFR 60.5398b(d), based on the information Bridger Photonics has submitted, as described below. EPA's Office of Air Quality Planning and Standards has been delegated certain authorities under this provision, including the authority to consider and/or approve alternative test methods for methane detection technology.

Bridger Photonics' gas mapping LiDAR (GML) and associated test protocol was approved by EPA's Office of Air Quality Planning and Standards on January 14, 2025¹. Bridger Photonics is now requesting a revision to the existing approved sampling protocol, Aerial Survey Alternative Test Method (MATM-002). In the request, Bridger Photonics has provided EPA with an updated protocol, Methane Alternative Test Method 2 (MATM-002): Aerial LiDAR Survey for Fugitive Methane Emission Monitoring in which Bridger Photonics has streamlined the recordkeeping

¹ https://www.epa.gov/system/files/documents/2025-01/final_approval_methane-atm_bridger-signed_508.pdf

requirements and has been re-formatted to better match the requirements in EPA's Guideline Document for Alternative test Method Requests².

Based on a review of the revised protocol, all required procedures and applicable quality assurance and control requirements appear to be consistent with the current operation of GML in the existing protocol. They are also consistent with the requirements in §60.5398b(d)(3)(vi)(C). EPA is therefore approving Bridger Photonics' request to replace the existing the sampling protocol associated the GML methane detection technology for 1 kg/hr, 2 kg/hr, 3 kg/hr, 5 kg/hr, 10 kg/hr, and less than or equal to 15 kg/hr, all at 90% probability of detection applications.

Because the alternative method may be used by owners and operators of affected facilities subject to the monitoring of fugitive emissions components, and inspection and monitoring of covers and closed vent systems subject to Subparts OOOOa and OOOOb, EPA will post this letter and the revised protocol on the EPA website at <https://www.epa.gov/emc/oil-and-gas-alternative-testmethods> for use by interested parties.

If Bridger Photonics should have any questions or require further information regarding this approval, please contact EPA staff at MethaneATM@epa.gov.

Sincerely,

Steffan Jonhson, Group Leader
Measurement Technology Group

cc: Greg Fried, OECA/AED
Elizabeth Leturgey, OECA/OC
Steffan Johnson, OAQPS/AQAD
Karen Wesson, OAQPS/AQAD

² <https://www.epa.gov/system/files/documents/2024-05/gd-56-alternative-test-methods-in-the-advanced-methane-detection-program.pdf>

