



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

1/02/2025

Dr. Daniel Bon
Carbon Mapper, Inc.
680 East Colorado Blvd.
Pasadena, CA 91101

Dear Dr. Bon

We are writing in response to your submission on behalf of Carbon Mapper Inc. (Carbon Mapper), located in Pasadena, California, submitted on November 5, 2024, in which you request certification as a “Third-Party Notifier” in the Super Emitter Program under the New Source Performance Standards of Performance for Crude Oil and Natural Gas Facilities for which construction, modification or reconstruction commenced after December 6, 2022 (40 CFR Part 60, Subpart OOOOb). We are considering this request under 40 CFR 60.5371b(b), based on the information you have submitted (as described below). The EPA’s Office of Air Quality Planning and Standards has been delegated certain authorities under this provision, including authority to consider and/or approve a candidate third party’s participation in the Super Emitter Program as a Third-Party Notifier.

Carbon Mapper has developed an aerial survey solution that uses a hyperspectral spectrometer (*NASA Jet Propulsion Laboratory (JPL) AVIRIS-class imaging spectrometer*) mounted in an aircraft to image and quantify methane plumes during planned surveys of target regions. On October 4, 2024, you requested approval of this aerial survey solution for use in the Super Emitter Program. That request was approved on January 2, 2025¹ as “MATM-001”. As we understand, Carbon Mapper will use this solution for its surveys and has developed a system consistent with the requirements in [§ 60.5371b](#) for collecting, evaluating and submitting data collected using the approved solution. To support your third-party certification request, you have provided the following information, including information claimed to be Confidential Business Information.

Note: In light of the CBI claims included in these documents, this letter includes only a general summary of the key

¹ <https://www.epa.gov/emc/oil-and-gas-alternative-test-methods>

elements provided in Carbon Mapper's submittal:

- General identification information for Carbon Mapper, received on November 5, 2024, including but not limited to the methane measurement solutions operated by Carbon Mapper, the curriculum vitae of the certifying official(s), and principal officer(s).
- Standard Operating Procedure (SOP) for evaluating data received using Carbon Mapper's aerial survey solution, received on November 5, 2024.
- SOP for maintaining essential records, first received on November 5, 2024 and a revision received on December 23, 2024.
- Quality Management Plan (QMP), first received on November 5, 2024 and a revision received on December 23, 2024, consistent with the EPA's Quality Management Plan Standard (Directive No: CIO 2015-S-01.0, January 17, 2023) for Non-EPA organizations.

Based on our judgment of the completeness, reasonableness, and accuracy of the Carbon Mapper's submittal, taking into account the material associated with your application, and the recognition that Carbon Mapper's own proprietary aerial survey solution has been approved for use in the Super Emitter Program, we are approving your request for certification as a "Third-Party Notifier" under the Super Emitter Program as described in [§60.5371b\(b\)](#).

As required by [§60.5371b\(b\)\(3\)](#), EPA will post this certification letter as TPN-001 on our website at <https://www.epa.gov/emc/third-party-certifications>. This certification allows the third party to identify super-emitter events in the oil and gas sector as described in [§60.5371b\(c\)](#). The certification is premised on the following:

- You will maintain records of your surveys consistent with the requirements found in [§60.5371b\(b\)\(2\)](#) and meet any other applicable requirements under §60.5371b.
- You will use the aerial system solution approved as MATM-001. If you intend to use another measurement solution for the Super Emitter Program, the solution must be approved by EPA, and you must request an amendment to your certification to incorporate the use of the solution and be recertified, as provided in [§60.5371b\(b\)\(4\)](#). Other significant changes to your procedures for identifying super-emitter events must also be approved through the process described in [§60.5371b\(b\)\(4\)](#).
- You will not engage in any illegal activity as part of any assessment of a survey, such as trespassing to better identify an event.
- You may be removed from the list of approved Third-Party Notifiers as described in § 60.5371b(b)(5).

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

Sincerely,

Steffan M. Johnson, Group Leader
Measurement Technology Group

cc:
Ned Shappley, OAQPS/AQAD
Michael Barrette, OECA/OC
Regional Testing Contacts