



January 30, 2018

Director of Research
2017 Public Comment Period
Sustainability Accounting Standards Board
1045 Sansome St., Suite 450
San Francisco, CA 94115

Re: Public comments on SASB provisional standard for Non-Renewables: Oil and Gas Services (NR0104)

Dear Sustainability Accounting Standards Board:

Global Affairs Associates is a sustainability consultancy that helps clients bridge business and sustainability. We believe that business-centered approaches are crucial for creating long-lasting value. We focus on materiality as the foundation for strategic communications with all stakeholders, including investors. We thank you for opportunity to provide public comment on the provisional standards for Oil and Gas Services.

Emissions Reduction Services & Fuels Management NR0104-01

Comments: The exclusion of scope 1 greenhouse gas emissions from this industry standard fails to satisfy the demands and expectations of many investors. This will result in increased reporting costs for companies and makes it difficult for investors trying to compare emissions across sectors and industries. *We recommend including scope 1 greenhouse gas emissions in this standard.*

Water Management Services NR0104-04; Chemicals Management NR0104-06 and NR0104-07

Comments: The current metrics for NR0104-04, NR0104-06, and NR0104-07 are too narrowly focused on hydraulic fracturing. These metrics are not cost effective and material to all the companies in this industry group. In the example of companies that only provide drilling services, water and chemicals are typically purchased and managed by the company's customer, an exploration and production (E&P) company. The driller typically has no financial control and/or limited operational control. The quantity of water and chemicals used is also relatively small compared to the amount used in hydraulic fracturing. Thus, for a driller, the water and chemicals metrics may not be of high materiality, and it would not be feasible or cost effective to report these metrics, which should be captured by the E&P companies. However, other aspects of chemicals and water management are likely to be material for all organizations. *We recommend revising these metrics considering a broader view of the industry, typical organizational boundaries, and a lifecycle view of chemical and water management beyond (but still including) hydraulic fracturing-related impact.*

Thank you for your consideration of our feedback on this provisional standard.

A handwritten signature in black ink, appearing to read "Kaitlyn Allen".

Kaitlyn Allen
President

Amanda Hsieh
Sustainability Consultant