

## Frequently Asked Questions (FAQs) Regarding the EPA Coalbed Methane Screener Survey

### 1. General Questions

*Do I have to fill out the survey?*

Yes. The U.S. Environmental Protection Agency (EPA) is conducting this data collection under the authority of Section 308 of the Clean Water Act or CWA (Federal Water Pollution Control Act, 33 U.S.C. Section 1318). You must respond to this questionnaire within 30 days of receiving it. For more information, please see the instruction booklet provided with the questionnaire.

*I received more than one screener survey, do I have to fill out all of them?*

Yes, some establishments received more than one survey since according to our records, you operate in more than one basin and/or state. The cover letter that was included with your screener surveys will indicate the basins and states that our records show you operating in. If your establishment has expanded to additional basins or states please note that in Item F, Question 2 and if your establishment no longer operates in one of the basins or states named in the cover letter please note that in the Remarks section.

*Why do I have to fill out the survey?*

EPA is conducting this data collection under the authority of Section 308 of the CWA (Federal Water Pollution Control Act, 33 U.S.C. Section 1318). You must respond to this questionnaire within 30 days of receiving it. For more information, please see the instruction booklet provided with the questionnaire. EPA plans to use the "Coalbed Methane Extraction Sector Survey" to collect information on geographical and geologic differences in the characteristics of CBM produced waters, environmental data, current regulatory controls, and availability and affordability of treatment technology options.

*I need more time to complete the screener*

If you wish to request an extension, you must do so **in writing** within 30 days of receipt of this questionnaire. For more information, please see the instruction booklet provided with the questionnaire.

*Where do I send the completed survey?*

Keep a copy and mail the completed survey (electronic file on CD or hard copy) to:

U.S. Environmental Protection Agency  
CBM Industry Screener  
c/o PG Environmental, LLC  
570 Herndon Parkway  
Suite 500  
Herndon, VA 20170

*How long do I have to complete the survey?*

The due date is 30 days calculated from the date of receipt.

*How long will it take to complete the survey?*

EPA estimates an average of 5 hours per response to generate, maintain, retain, or provide information in the survey.

*Do I have to answer all the questions?*

Yes. You must complete all the questions as instructed. If the information for a question is not available or unknown, provide a comment in the Remarks section as the response to the question.

*What if my response is larger than the space provided in the hard copy survey? (i.e., not enough rows or not enough space in a column)?*

If you are using the hard copy survey, photocopy the question page(s) before writing on it and number the photocopied pages in the upper right hand corner. Insert copies in sequence behind the original.

*Can I fill out a hard-copy survey rather than the electronic screener survey?*

Yes, however, EPA encourages you to use the electronic format. The electronic format is designed to reduce the burden associated with completion of the survey – for example, changing one of your responses requires significantly less effort in the electronic version than in a hard copy form. The electronic survey also provides validation options for you to assure that you are submitting a complete and accurate survey, which reduces the likelihood of follow-up communication by EPA to clarify responses and/or correct errors.

If you would prefer to use the hard copy you are free to do so and you can just fill out the survey you received in the mail.

*How many sites have received this survey?*

The screener survey will be sent to 290 owners and operators of CBM wells throughout the major producing basins in the U.S. These recipients have been identified in data collected by the states as the owner/operator of CBM wells.

*How will the screener survey results be used?*

EPA will use the information collected in the survey to determine whether to initiate a rulemaking to potentially revise the ELGs for the Oil and Gas Extraction Point Source Category (40 CFR Part 435) to include limits for pollutants discharged in CBM produced water. The screener collects only information that EPA needs to select a representative sample of the industry for the detailed survey.

*What about submitting confidential business information (CBI)?*

If you wish to protect the information from public disclosure, you may assert a claim of business confidentiality covering all or part of the information you submit. This should be done at the time the information is submitted.

You may claim as confidential all information included in the response to a question by stating so in the "Remarks" section of the screener survey. If a response is not marked as confidential, EPA assumes that the response is not confidential. Regulations governing the confidentiality of business information are contained in 40 CFR Part 2, Subpart B.

*What assurances do I have that CBI will be protected?*

Regulations governing the handling of confidential business information are contained in 40 CFR Part 2, Subpart B. Please refer to the survey Instruction Guide (Part IV) for a summary of these regulations.

## **2. Electronic Screener Questions**

*What is the electronic screener?*

The electronic screener is a version of the screener survey you received in the mail that was created using Microsoft Excel 2003. The electronic screener is compatible with Microsoft Excel 2003 and all newer versions of Microsoft Excel.

### *How is the electronic screener set up?*

The electronic screener contains nine worksheets that are labeled by tabs at the bottom of the page. The electronic screener contains the instruction guide, the cover page, two user guides for the worksheets, and five worksheets that contain the survey questions.

### *What should I do if nothing happens when I click on the electronic screener Excel navigation arrows?*

If nothing happens when you click the arrows in the electronic screener you will need to enable macros. If the security box appears upon opening the file, then you should click "enable macros." If the security box does not appear upon opening the file, you will need to change your security settings to allow you to enable macros.

#### How to enable macros if you are using Excel 2003:

If you have opened the electronic survey and the "Security Warning" box did not appear then you must change the security setting by doing the following:

1. Select from the Excel menu Tools --> Macro --> Security
2. In the Security box select "Medium Security" and press Ok
3. Close the survey and then open it again
4. The "Security Warning" box should now appear and click "Enable Macros"

#### How to enable macros if you are using Excel 2007:

If upon opening the file and clicking on an arrow a macro error box appears, then you must do the following:

1. Select "Office" button --> "Excel Options" button (bottom of menu) --> "Trust Center" link in left column --> "Trust Center Settings" button --> "Macro Settings" link in left column
2. Select radio button beside "Enable all macros" and click "Ok"
3. Close the file
4. A message will prompt you to save the file
5. Save the file and then reopen the file

If you are still having problems with the macros buttons, use the labeled worksheet tabs at the bottom of the survey to move from one worksheet to another.

*How do I navigate from one worksheet to another and how do I navigate within the worksheet?*

This electronic survey uses macros buttons in the form of arrows to move from one worksheet to another. It is important to note that these arrows only take you to another worksheet. Within that worksheet you will have to move to the appropriate cell that corresponds to the question you are referring to. If you are having difficulty enabling macros on your computer, you can use the labeled worksheet tabs at the bottom of the survey to move from one worksheet to another. Within a worksheet, you can move to the neighboring cell to the right by hitting the Tab key. Some cells in this survey are locked and therefore cannot be changed or manipulated by the user.

*How many projects can I put on the electronic screener?*

Each electronic survey has enough spaces for 25 projects. If you have more than 25 projects please download and submit an additional electronic survey.

*What if my response is larger than the space provided in the electronic screener (i.e., not enough rows or not enough space in a column)?*

The electronic screener survey will allow you to generate 25 project response fields. If you need more than 25 project response fields, then make another electronic copy of the e-survey and label it "Copy # of #."

*I'm having problems with the worksheet containing Item A-C*

<b>Worksheet</b>	<b>Section</b>	<b>Description</b>
<b>Item A-C</b>	Item A	The hardcopy of the screener survey that you received in the mail contained an establishment name in the mailing address label. You should have also filled in this information in the Address Label box on the Cover Page worksheet. This section asks you to confirm if the establishment name on the address label was correct. The cell to the right of the question is a dropdown menu, so when you click on the box an arrow will appear to the right of the box. If you click on the arrow a list will come up with the choices "Yes" or "No". If you select "Yes" the cell to the right will highlight blue meaning that you do not need to type in the establishment name. If you select "No" the cell to the right will not highlight and you should type in the correct establishment name.
	Item B	Item B asks you to fill in a contact person in case we have any questions about your responses. Please fill in the Name, Street Address, City, State, Zip, Phone, and E-mail in the appropriate sections.
	Item C	Item C asks if your establishment owned or operated any coalbed methane wells in 2008 only. The cell to the right of the question is a dropdown menu, so when you click on the box an arrow will appear to the right of the box. If you click on the arrow a list will come up with the choices "Yes" or "No". Please follow the instructions to the right of the dropdown menu cell when you have selected the appropriate response.

*I'm having problems with the worksheet containing Item D-E*

Worksheet	Section	Description
Item D-E	Item D	Item D includes two questions. The first question asks if the highest level of corporate ownership in 2008 was a small business. There is a table to the right with the common size standards that you should use to help you answer the question. The cell to the right of the question is a dropdown menu, so when you click on the box an arrow will appear. If you click on the arrow a list will come up with the choices "Yes" or "No" and you should then select the appropriate response. The second question below, asks you to give an approximate date for the availability of your 2008 fiscal year financial data. Please be as specific as possible.
	Item E	Item E asks you how many projects your establishment owned or operated. You will be asked to list these projects and provide more specific information on these projects in Item F.

*I'm having problems with the worksheet containing Item F: Project Information*

Worksheet	Column	Description
	Project Name or Identifier	The name and/or number of the coalbed methane project. This name or identifier is automatically carried over into the Contact Information and Remarks worksheets. Edits to the "Project Name or Identifier" must be made in the Project Information worksheet.
	Project Location	This column includes 2 cells, "Basin (e.g., Powder River)" and "State (2-letter abbreviation)." Please put the basin that the specific project is located in and the state 2-letter abbreviation in their respective cells. Please indicate a basin name that you use and other operators would recognize.
	Did you buy or sell this project during 2008?	This column consists of 2 cells, "Yes or No" and "If Yes, what month?". The first cell, "Yes or No" is a dropdown menu. When you click on the cell, an arrow will appear to the right of the cell and when you click on the arrow the choices "Yes" and "No" will appear. When you select "Yes" the cell to the right will turn from blue to white indicating that you should answer the question "If Yes, what month?". If you select "No" the cell to the right will remain blue indicating that you do not need to fill in the neighboring cell.
	Number of wells for this project in 2008	This should be the number of wells in the specific project identified in the "Project Name or Identifier" column for 2008 alone.
	Combined gas production from wells in 2008	This should be the number of the combined (total) gas production from the wells for the specific project identified in the "Project Name or Identifier" column for 2008 alone.
	Units	These cells are referring to the units used in the neighboring cell for the "Combined gas production from wells in 2008." This column is made up of two cells, "Thousands of Cubic Feet (Mcf) or Other" and "If Other, enter reporting units." The first cell, "Thousands of Cubic Feet or Other," is a drop-down menu. When you click on the cell an arrow appears to the right of the cell. By clicking on the arrow you can select "Thousands of Cubic Feet" or "Other." The default unit is Thousands of Cubic Feet (Mcf) and automatically appears in all the cells in the column. If you are reporting your "Combined gas production from wells in 2008" in other units, please select "Other" and put the units you are using in the "If Other, enter reporting units" cell.

Worksheet	Column	Description
	How did you manage your process water?	This column consists of 8 cells, including "Discharge to surface water," "Discharge to POTW," "Land application," "Underground injection," "Evaporation/infiltration pond," "Livestock/wildlife watering," "Trucked/transported off-site to a 3rd party", and "No water produced." The option "Discharge to POTW" is referring to any discharges to a publicly owned treatment works. The option "Land application" is referring to any discharges applied to land with or without crop production. Each cell is a drop-down menu. When you click on the cell, an arrow will appear to the right of the cell and when you click on the arrow an "X" will appear. Place an "X" under every method that you used to manage your process water. If you accidentally select an "X" from the drop-down menu, you must hit the Delete key (not the Backspace key) to clear the cell.

*I'm having problems with the worksheet containing Item F: Contact Information*

Worksheet	Column	Description
<b>Contact Information</b>	Project Name or Identifier	The project name or identifier is automatically filled in based on what was identified as the project name or identifier in the Project Information worksheet. This column is locked, so in order to edit the project name or identifier you must return to the project information worksheet and make the edit there.
	If this project is selected where should we send the second questionnaire?	The cells in this column appear as drop-down menus. When you click on the cell an arrow will appear to the right of the cell. By clicking on the arrow you can select one of the three choices. The choices are "To the same contact person identified in Item B," "To the same person identified in the previous project," and "Other (Please identify contact person)." If you select "Other (Please identify contact person)," the neighboring cell in the "Contact Information required?" column will appear highlighted with "Yes" in the cell. The neighboring cells in the "Name," "Employer," "Street Address," "City, State, Zip," "Phone," and "Email" columns will change from royal blue to white, allowing you to enter the contact person information for that project in those cells.
	Contact Information required?	This cell is automatically filled in with "Yes" highlighted yellow, or "No" depending on your response to the question "If this project is selected where should we send the second questionnaire?" in the neighboring cell.
	Name, Employer, Street Address, City, State, Zip, Phone, Email	This information is required if the cell appears white. This information is not required if the cell appears royal blue.

*I'm having problems with the worksheet containing the Remarks section*

Worksheet	Column	Description
<b>Remarks</b>	Remarks	This section should be used to clarify any survey responses in the Project Information and Contact Information worksheets, including identifying any confidential business information. Please identify the column and row you are referring to in your remarks.

### 3. Item Specific Questions

#### 3.1 Item C: Operating Status in 2008

*I'm not sure whether we should be considered to own or operate CBM wells; we sold/acquired wells so we have only a few weeks/months of data*

Even if you only owned or operated wells briefly in 2008, the answer should be "Yes."

I'm not sure we are the owner or operator. What does this mean?

The survey defines "owner or operator" as the owner or operator listed with state oil and gas commissions, e.g., in well drilling or production databases.

*I operate wells where a portion of the gas from these wells is considered conventional (or another unconventional gas), not CBM. Do I answer "yes" to the question of owning or operating CBM wells?*

If any of the wells are producing gas and/or water from coalbed strata, please answer "yes" to owning or operating CBM wells and continue with completing the survey.

*In 2008, wells in my project(s) produced only water and no CBM. Do I answer "yes" to owning or operating CBM wells?*

If these wells are dewatering a coalbed stratum for the ultimate purpose of producing CBM, check "yes" to owning or operating CBM wells and continue with completing the survey.

*In 2008, the wells in my projects were drilled but were not yet producing either CBM or water. Do I answer "yes" to owning or operating CBM wells?*

If these wells are expected to produce CBM gas, please check "yes" to owning or operating CBM wells and continue with completing the survey.

*I only have a working interest in CBM wells. Should I answer yes to owning or operating CBM wells?*

If you are the listed owner/operator of these wells in the state oil and gas commission databases, please answer "yes." If you think a detailed questionnaire should go to another firm or firms, however, you can indicate this in Part F, Question 7. If you are (1) not sure of your status as the listed owner/operator, or (2) not the listed operator and/or you cannot answer the project-specific questions, please contact the EPA helpline (1-800-764-4414 or [cbmscreener@pgenv.com](mailto:cbmscreener@pgenv.com)).

*I am a contract operator of CBM wells, and I do not own a working interest in any such wells. Should I answer yes to owning or operating CBM wells?*

If you are the listed operator of those wells, you should answer Yes, but if you have any concerns with answering the questions that follow, you can contact the EPA helpline (1-800-764-4414 or [cbmscreener@pgenv.com](mailto:cbmscreener@pgenv.com)) for further assistance and instructions.

### **3.2 Item D: Business Size and Financial Data Availability**

*My firm is owned (in part or in whole) by another firm. Can my firm qualify as a small business?*

The firm might be able to qualify as a small business, but only if the firm has no affiliation with a large firm. If the owner firm is a large business (even if it is a minority owner in some cases), the firm is considered affiliated with a large firm and cannot claim to be a small business. If you are not certain about your affiliation status, please contact the EPA helpline (1-800-764-4414 or [cbmscreener@pgenv.com](mailto:cbmscreener@pgenv.com)).

*My firm is foreign-owned. If we meet the size standards, are we classified as a small business?*

Only in rare instances can a foreign-owned firm meet the conditions for being a small business, since that firm must meet the size standards and also provide a significant contribution to the U.S. economy. If the firm is foreign-owned, you should be directed to check the box marked “no.”

### **3.3 Item E: Number of CBM Projects**

*I don't understand what you mean by project.*

A project in this survey is defined as a well, group of wells, lease, group of leases, or some other recognized unit that your establishment operates as an economic unit when making production decisions. If you still need assistance in defining project, please contact the EPA helpline (1-800-764-4414 or [cbmscreener@pgenv.com](mailto:cbmscreener@pgenv.com)).

*I commingle CBM with conventional gas in one or more of my projects. Do I include such projects in the count of projects?*

Yes, and respond to the project-specific questions for any such projects.

*My project did not produce CBM gas in 2008 or produced only water in 2008. Do I include such projects in the count of projects?*

Yes, and respond to the project-specific questions for any such projects.

### **3.4 Item F: CBM Project Information**

*What is the name or identifier that you use for this project?*

The identifier for the project is a name or number that is familiar to the operator. If no identifier exists, you should assign the identifiers A, B, C, etc.

*I don't know what basin my project is in or my project is not in a designated basin.*

If you are not certain how to designate a basin for your project, please contact the EPA helpline (1-800-764-4414 or [cbmscreener@pgenv.com](mailto:cbmscreener@pgenv.com)) and the helpline staff will assist you in identifying the region or basin name. Some key basin names include the Appalachian Basin, Illinois Basin, Black Warrior Basin, Cahaba Basin, Arkla Basin, Arkhoma Basin, Anadarko Basin, Cherokee/Forest City Basin, San Juan Basin, Raton Basin, Uintah-Piceance Basin, Green River Basin, Wind River Basin, and Powder River Basin.

*When you ask about the maximum number of CBM wells producing water or gas that were in a project, does this mean I should exclude any wells in the project that were producing conventional gas only? What about those that commingle CBM and conventional gas in the same wellbore?*

Please exclude conventional gas-only wells, but do include all wells that commingle CBM and conventional gas within the same wellbore.

*My project did not produce CBM gas during 2008. How do I answer the questions on numbers of wells and production?*

If the wells in your CBM project were drilled but not yet in production (water or gas) in 2008, you can insert "0" in the box for the count of producing wells and mark 0 for your production. If the wells in your project were producing only water, put the count of those wells producing water in the box requesting the count of producing wells, and mark "0" for your production.

*I sold or acquired a project or part of a project during 2008. How do I answer the production question?*

Indicate what month in 2008 the project or part of the project was sold and include all production in 2008 up to the date the project or part of the project was sold.

*I initiated or shut-in production on a project midway through 2008. How do I answer the production question?*

You should not modify your response, include all production in 2008 on a project up to the shut-in or stop in production.

*When you ask about the combined gas production, do I include conventional gas and CBM if the project produces both?*

Do not include any conventional gas from conventional gas-only wells (estimates are acceptable), but do include all gas from wells that commingle CBM and conventional gas within the same wellbore.

*What do you mean by other reporting units?*

If you have a very large project and wish to provide numbers on a million cubic feet (MMcf) or billion cubic feet (Bcf) basis, for example, simply report the number and note that it is in MMcf or Bcf. Alternatively, if you wish to report in millions of British thermal unit BTUs (MMBtus), you are free to choose this unit for reporting.

*I don't think my produced water management method is reflected in the list of options. How should I respond?*

If you do not think your management method is reflected, please use the remarks section at the end of the questionnaire to describe your method in detail.

#### **4. Definitions of Selected Key Terms**

Clean Water Act – Federal legislation enacted by Congress to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters” (federal Water Pollution Control Act of 1972, as amended, 33 U.S.C. 1251 et seq.).

Coalbed Methane (CBM) – Natural gas found in coal seam reservoirs.

Coalbed Methane (CBM) Project – A CBM project comprises a well, group of wells, lease, group of leases, or recognized unit which you operate as an economic unit when making production decisions. The well or wells may be associated with one or more water management practices (that is, the project

should be defined on the bases of gas production economics, not necessarily on the basis of water management system). If a project operates as a unit in which you are not the sole operator, please include information only for that portion of a unit for which you actively operate. EPA understands that the concept of a project is variable over time, so the well or wells included as a part of a project should be those that best defined the project as it existed in 2008.

Discharge – The discernible, confined, and discrete conveyance of pollutants to : (1) United States surface waters such as rivers, lakes, and oceans (“direct discharge”), or (2) a publicly owned, privately owned, federally owned, combined, or other treatment works (“indirect discharge”). See 40 CFR 122.2.

Evaporation – The process by which water or other liquid becomes a gas. Water from land areas, bodies of water, and all other moist surfaces is absorbed into the atmosphere as a vapor.

Fiscal Year – A 12 month period over which a company budgets its spending. A fiscal year does not always begin in January and end in December; it may run over any period of 12 months.

Infiltration – The process by which water penetrates into soil from the ground surface.

Injection Well (Deep or Shallow Well Injection) – Any bored, drilled, or driven shaft or a dug hole, improved sinkhole, or a subsurface fluid distribution system where the depth is greater than the largest surface dimension that is used to dispose of fluids underground. See underground injection.

NAICS – NAICS is an economic classification system. Economic units that use like processes to produce goods or services are grouped together. These units are assigned a code for identification purposes. US Census Bureau (<http://www.census.gov/epcd/www/naics.html>). Common 6-digit NAICS in the CBM extraction industry include 211111, Crude Petroleum & Natural Gas Extraction; 213111, Drilling Oil and Gas Wells; 213112 Support Activities for Oil and Gas; 212111, Bituminous Coal & Lignite Surface Mining; 212112, Bituminous Coal Underground Mining; 221210, Natural Gas Distribution; 221112, Fossil Fuel Electric Power Generation; and 324110 Petroleum Refineries.

Privately Owned or Held – A company whose shares are not traded on the open market.

Produced Water – Water drawn from any hydrologic unit for the purpose of producing hydrocarbons.

Publicly Owned or Held – A company which has issued securities through an offering, and which are now traded on the open market.

Publicly Owned Treatment Works (POTW) – Any device or system owned by a state or municipality that is used to recycle, reclaim, or treat liquid municipal sewage and/or liquid industrial wastes.

Receiving Waters – A stream, river, or other surface water body to which wastewater or other pollutants are discharged.

Surface waters - Waters of the United States. See 40 CFR 122.2.

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=8a3bce0135f51c11befeff39ba51e426&rgn=div5&view=text&node=40:21.0.1.1.12&idno=40#40:21.0.1.1.12.1.6.2>.

Underground Injection – The technology of placing fluids underground, in porous formations of rocks, through wells or other similar conveyance systems. See injection well.

Water Reuse – Beneficial use of coalbed methane produced water (e.g., livestock watering, irrigation, or dust control) in lieu of discharge/disposal.