

The Oil and Natural Gas Industry: Information Collection Request

Background

- On March 10, 2016, as part of the Obama Administration's commitment to addressing air pollution and climate change, EPA announced its next step in reducing emissions from the oil and natural gas industry: Moving to regulate emissions from existing sources.
- The agency will begin with an Information Collection Request to gather a broad range of information on existing sources of methane emissions, technologies to reduce those emissions, and the costs of those technologies.
 - Will cover the production, gathering, processing, and transmission and storage segments of the oil and gas sector.

What is an ICR?

- Formal process to collect data and information
- Public has opportunities to review and comment on draft information request
- An ICR can include surveys and require emissions monitoring
- Industry is required to respond

Why is an ICR needed?

- Information that has become available in the past few years, including data reported in GHGRP, and from external studies, has improved our understanding of methane emissions from existing sources
 - Emissions are significantly higher than previously understood
- To develop standards for existing sources, EPA needs additional information, such as:
 - Facility, or site characteristics
 - Baseline control levels
 - Emission reduction technologies and costs
 - Ranges of equipment used and operating conditions
 - Monitoring challenges
 - Other rules that may apply to the sources

Key Oil and Gas Methane Sources

- Pneumatic controllers (including intermittent pneumatic devices)
- Tanks (including uncontrolled tank flashing)
- Equipment leaks
- Liquids unloading
- Pumps
- Reciprocating compressors
- Centrifugal compressors
- Blowdowns
- Associated gas venting
- Closed vent system and control malfunctions

What information do we need to collect?

Examples include:

- Facility or site characteristics
 - Equipment descriptions and configuration
 - Well information- age, production, workover schedules
 - Availability of electricity, generating capacity, gathering lines
 - Information on manned and unmanned operations and frequency of onsite personnel
 - Availability of monitoring equipment
- Baseline levels of control and applicable requirements
- Information on maintenance and non-routine events such as blowdowns and malfunctions

What information we need to collect – examples, cont.

- Design information
 - Separators
 - Flares, combustors
 - Vapor recovery units, separator towers
 - Closed vent systems
 - Monitoring approaches
- Select number of sources to conduct testing (i.e., pressurized separator samples)
- Cost Information

ICR Process & Schedule

- Governed by the Paperwork Reduction Act
- Provides two public review opportunities:
 - ▶ 1st draft ICR 60-day Public Comment Period
 - EPA will revise the draft as necessary based on public comment
 - 2nd draft ICR— 30-day Public Comment Period
 - EPA will send to the Office of Management and Budget for their review
 - EPA works with OMB to get the ICR (survey) approved
 - EPA will revise the draft as necessary based on public comment
- Final ICR issued; survey sent to industry
- EPA anticipates signing draft ICR this spring; surveys would go out this fall.

ICR Collection Approach

- EPA would send a detailed survey to a representative sample in each segment of the industry (i.e., producers, transmission/storage, processors, etc.)
- Information would be reported through EPA's electronic Greenhouse Gas Reporting Tool (e-GGRT)

For more information

- Information on the March 10, 2016 announcement:
 - https://www3.epa.gov/airquality/oilandgas/methane.html
- ► ICR process questions: Brenda Shine 919-541-3608; shine.brenda@epa.gov