

## Information Collection Request for the Oil and Gas Industry

### Frequently Asked Questions

In November 2016, EPA issued an Information Collection Request (ICR) to gather information that will help the agency assess what may be the best approach for reducing emissions of smog forming volatile organic compounds and methane from oil and gas sources. EPA currently does not have all of the information we need to determine this approach, including information on costs and technical feasibility of measures to mitigate air pollution from this industry. Additional information about the need for the ICR is available in EPA's supporting statement at <http://go.usa.gov/x9CNz>

Answers to many frequently asked questions about the ICR are below. If you have questions that are not addressed here, please call EPA's Oil and gas ICR help desk, toll free at 888-372-8696, or email us at [icr@epa.gov](mailto:icr@epa.gov). Help desk hours are 8 a.m. to 5 p.m. EST, Monday through Friday, except for federal holidays.

#### [Questions about the ICR and ICR letters](#)

#### [Questions about filling out the ICR form](#)

#### General Questions

**1. Why did I receive a letter – and what am I supposed to do?**

**A:** EPA has sent a questionnaire to all owners and operators in the oil and gas production segment and owners and operators of downstream facilities. The agency is seeking information under the Clean Air Act about processes and equipment throughout in the oil and gas industry. Please fill out the survey and return it by the deadline indicated in your letter. The web address to access the survey is included in the letter; you also may download it from EPA's website at <http://go.usa.gov/x9CVp>, under the section labeled "Information for ICR Recipients."

**2. I was expecting a letter, but I haven't received it yet. What should I do?**

**A:** Please contact the ICR help desk at 888-372-8696, or email us at [icr@epa.gov](mailto:icr@epa.gov). We will confirm whether you are listed as a survey recipient and double check the address.

**3. I received an ICR letter, but I do not own or operate any oil or gas facilities. What should I do?**

Please contact the Oil and Gas ICR hotline at 888-372-8696 or [icr@epa.gov](mailto:icr@epa.gov) for assistance.

**4. My response deadline falls on a weekend. What should I do?**

A: If your deadline falls on a weekend or holiday, responses are due the next business day.

**5. What should I do if I received a letter asking that I respond to the ICR for:**

- a company I neither own nor work for, or
- a facility that neither I nor my company owns or operates?

A: Please notify EPA at 888-372-8696 or [icr@epa.gov](mailto:icr@epa.gov) with specifics of your situation. Please include your name and ICR ID(s) in your message. If you recently divested these assets, please provide the name and address of the new owner/operator.

**6. We have recently acquired or divested of several facilities. Which ones must I report in my ICR response?**

A: You are responsible for reporting for facilities that you own or operate as of the day you receive the letter.

**7. I received an ICR letter for wells that my company owns/partially owns but does not operate. Do I have to complete the survey?**

A: EPA is not seeking duplicative information. If you can confirm that the well operators are reporting for the wells that your company owns/partially owns, then you do not have to complete the survey for those wells. However, if the operators did not receive an ICR letter, then you are responsible for reporting for those wells. You may, of course, coordinate with the operators to respond. In addition, you may contact the ICR help desk to provide EPA the operators' contact information so that we may send them a letter. The help desk number is 888-372-8696, or you may email us at [icr@epa.gov](mailto:icr@epa.gov)

**8. My ICR letter did not list all of my oil and gas production facilities, which are under different subsidiaries. Do I have to report for the subsidiaries that were not listed?**

A: Yes. You are required to report for all oil and gas wells that you own or operate that are capable of producing as of the date that you received the ICR letter, regardless of the subsidiary name used.

**9. I received an e-mail with an invitation code and ICR ID but have not received a letter. Do I need to report?**

A: If you received an email, you are obligated to respond. If you received an email but no hard copy, you may use the invitation code and ICR ID provided in the e-mail to respond to the ICR. If you would like a hard copy of the letter, please provide us with your current address, and we will send you a copy of the letter. Please contact the ICR help desk at 888-372-8696, or email us at [icr@epa.gov](mailto:icr@epa.gov) to provide the address.

**10. I am not required to submit data to the Greenhouse Gas Reporting Program under 40 CFR Part 98 Subpart W. However, I received a letter asking me to respond to this ICR. Am I required to do respond?**

A: Yes. This ICR seeks information about the entire oil and gas industry and may cover facilities that are not required to report under Subpart W.

**11. My facility is located past the local distribution company (LDC) custody transfer station. Am I required to respond to the ICR?**

A: No. If a selected facility is located past the local distribution company (LDC) custody transfer station (as defined in Enclosure 1 that you received with your letter), then you are not required to complete the survey for that facility. Please send us an email stating that your facility is past the LDC. You may send it to [icr@epa.gov](mailto:icr@epa.gov).

**Questions about filling out the Part 1 Operator Survey**

**12. I am unable to complete the survey online. May I get a paper copy?**

Yes. You may download the survey here: <http://go.usa.gov/x9CpP>. If you are unable to download the form, please contact the Oil and Gas ICR Help Desk at 888-372-8696 or [icr@epa.gov](mailto:icr@epa.gov), and we will send you a copy.

**13. I can't get the County and State drop down box to work. How do I report my County/State?**

A: Please select a Basin ID first. Then the drop down menu should be activated, and you should be able to select your county and state. If the drop down menu still does not work, please let us know by contacting the Oil and Gas ICR help desk at 888-372-8696 or [icr@epa.gov](mailto:icr@epa.gov).

**14. I don't know the name of the basin(s) where my wells or surface sites are located. How do I find this information?**

A: The [Basin Lookup Tool \(XLSX\)](#) (2 pp, 219 K) will help you to find your basin ID. Open the spreadsheet, enter your county and state, then hit the enter key to find your basin ID. The tool also includes a list of basin IDs by county.

**15. What is the Facility ID? Is it my API Well Number?**

A: The facility ID number is a number that we use for identification purposes. It is unique to EPA. You can find that number at the bottom of page 1 of your operator survey ICR letter. Please use that number as the Operator ID number in your response for the Part 1 operator survey.

**16. Is there a difference between the US Well Number and the API Well ID?**

A: No. API used to administer the well IDs. They are now being administered by the Professional Petroleum Management Association and are now called the US Well Number. The US Well ID number generally has a 14-digit format. Please use this number when referring to your wells in your ICR response.

**17. What is a "Unique Surface Site ID" noted in sections 3 and 4 of the survey?**

A: You may use any number as your Unique Surface Site ID. EPA recommends that you use a permit number, well ID, or lease name corresponding to the surface site, but you may choose any name for the surface site -- as long as it does not duplicate name for any other surface site within that given

section of the Part 1 survey. The Unique Surface Site ID, together with the description, should be sufficient for you to recognize the well surface site in case we contact you to clarify information you have reported for that surface site.

**18. Are centralized production surface sites and well surface sites the same thing?**

No. A **well surface site** is an area that contains a well or wells and their associated equipment (such as a tank used for liquids unloading.) It may also have separating and processing equipment. A **centralized production surface site** is an area that is separate from a well site and is dedicated to receiving and processing liquids or liquids and gases from nearby well sites. NOTE: If a site receives only gas, it not considered a centralized production surface site; it would be a gathering and boosting compressor facility. These terms are discussed in the definitions tabs of both the Part 1 Operator Survey and the Part 2 facility survey, available at <http://go.usa.gov/x9rHQ>

**19. For atmospheric storage tanks greater than or less than 10 bbl/day, is that based on capacity or throughput?**

A: It is based on throughput (the volume that is going into the tank on a daily basis), averaged over the past twelve months.

**20. Does the 10 bbl/day separator throughput cutoff for pressurized liquid sampling and analysis apply to oil/condensate throughput, produced water throughput, or both?**

A: The 10 bbl/day throughput cutoff applies to the combined throughput of both oil/condensate and produced water.

**21. Do I have to complete a separate worksheet form (with a new operator ID) for each lease or field that I operate?**

A: No. Please complete a separate worksheet form (with a new operator ID) for each “field operator site,” which is defined as a centralized office or company that serves as the overall manager of the operations of one or more well sites. (This is different from a lease or field.)

Most operators will need to complete only one worksheet to report all of their wells. Larger production companies that have separate offices or subsidiaries managing wells in different states or regions will need to complete a separate worksheet for each of these different field offices or subsidiaries.

**22. Do I have to report for wells that are not actively producing?**

A: You must report for all wells that are *capable* of production. For example, if a well is shut-in but still capable of production, you must include that well in your ICR response. (See also the FAQ for plugged and abandoned wells.)

**23. Do I have to report for plugged or abandoned (P&A) wells?**

A: You are only required to report for plugged or abandoned wells that are located on well surface sites that are capable of production – Those are sites that contain an actively producing well or a temporarily shut-in well. If a plugged well is not located on a well surface site that is capable of production, then you are not required to include that well in your ICR response.

**24. My letter asks if my surface site is subject to fugitive emission requirements in 40 CFR 60.5397a of subpart OOOOa? I don't understand what this means.**

A: This refers to EPA's regulations for new, modified and reconstructed oil and natural gas sources. The acronym "CFR" stands for Code of Federal Regulations. Please let us know if you would like a copy of the regulation cited and we can provide that to you. A surface site must meet the following criteria to be subject to the fugitive emission requirements included in the cited regulation:

- It was constructed, modified, or reconstructed on or after September 18, 2015
- It does not consist of only wellheads (i.e., there is other equipment with fugitive components on site).

**25. For gathering and boosting, what does the EPA mean by "pipeline facilities"?**

A: *A Gathering and Boosting Pipeline Facility* is defined as all natural gas gathering pipelines and associated equipment under the control of the same person (or persons under common control) that are within a single state, single county, and single hydrocarbon basin in the onshore petroleum and natural gas gathering and boosting industry segment. This does not include equipment that is located at a Gathering and Boosting Compression Facility.

**26. What do you mean by "associated equipment" for gathering and boosting pipeline facilities?**

A: Associated equipment includes, but is not limited to, dehydrators, acid gas removal units, pig launchers/receivers, pressure vessels, and storage tanks, and may include equipment at well surface sites if that equipment is owned/operated by the Gathering and Boosting Pipeline Facility. This definition is included with the Surveys and is included in EPA's Supporting Statement for the Oil & Gas ICR here [<https://www.epa.gov/sites/production/files/2016-11/documents/oil-natural-gas-icr-supporting-statement-epa-icr-2548-01.pdf>].

**27. How do I know if I have any wells for which I need to complete the Part 2 survey?**

A: There is a tool that will automatically determine that for you. The tool is available on our website at <http://go.usa.gov/x9CVp>

When you get to that page, scroll down until you see a header labeled Part 2 Instructions. Look a little further until you see Selected Production Well List. That is the file you need.

Under the section labeled "Information for ICR Recipients," you will see a spreadsheet labeled Part2SelectedProductionWelllist. Open that file (you will probably have to download it) and look for the second tab at the bottom of the file, labeled "Matching Tool."

Click on the "Matching Tool" tab, and go to Row 8 in the spreadsheet. Under the column labeled Operator's US Well ID List, enter the US Well IDs for each of the wells that you operate. Enter one number on each line.

Once you have finished, the tool will determine the wells for which you are to complete the Part 2 survey. It is important to enter your Well ID numbers properly; the tool will convert 10- and 12-digit well ID numbers to the 14-digit format.

For each well that is selected, please complete the Part 2 survey for the “well site facility” associated with that well. For the full definition of “well site facility” please see the “Definitions” tab in either the Part 1 or Part 2 survey forms or in Attachment 3C to EPA’s Support Statement for the Oil & Gas ICR here. All of these are available on EPA’s website at <http://bit.ly/OILGASICR> . If you need assistance, please contact the ICR help desk at 888-372-8696.