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Integrating State Data & the National Oil and Gas Emissions Inventory Tool: The Oklahoma Experience

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Acknowledgments

Support from OKDEQ, including the hard work of the following staff:

• Mark Gibbs, Louise Esjornson, Tom Richardson, Lindsay Ross, Shelby Willeby, Carrie Schroeder, Cecelia Kleman, Cooper Garbe, Justin Milton, Jay Laughlin, Shannon Hill, Hanna Bentley

Help from ERG and Ramboll-Environ:

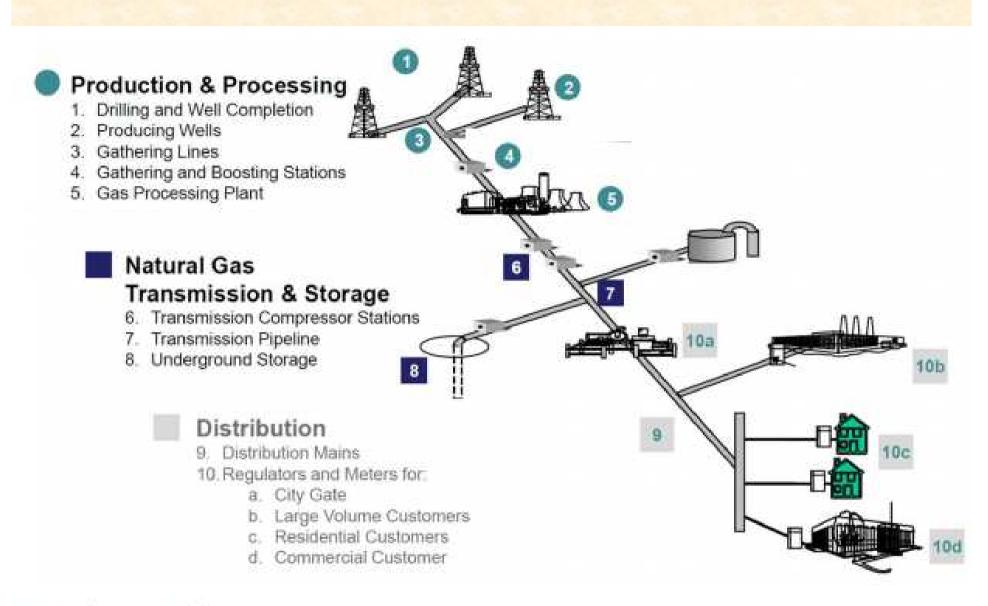
- Regi Oommen, Mike Pring
- John Grant, Amnon Bar-Ilan

Assistance from EPA:

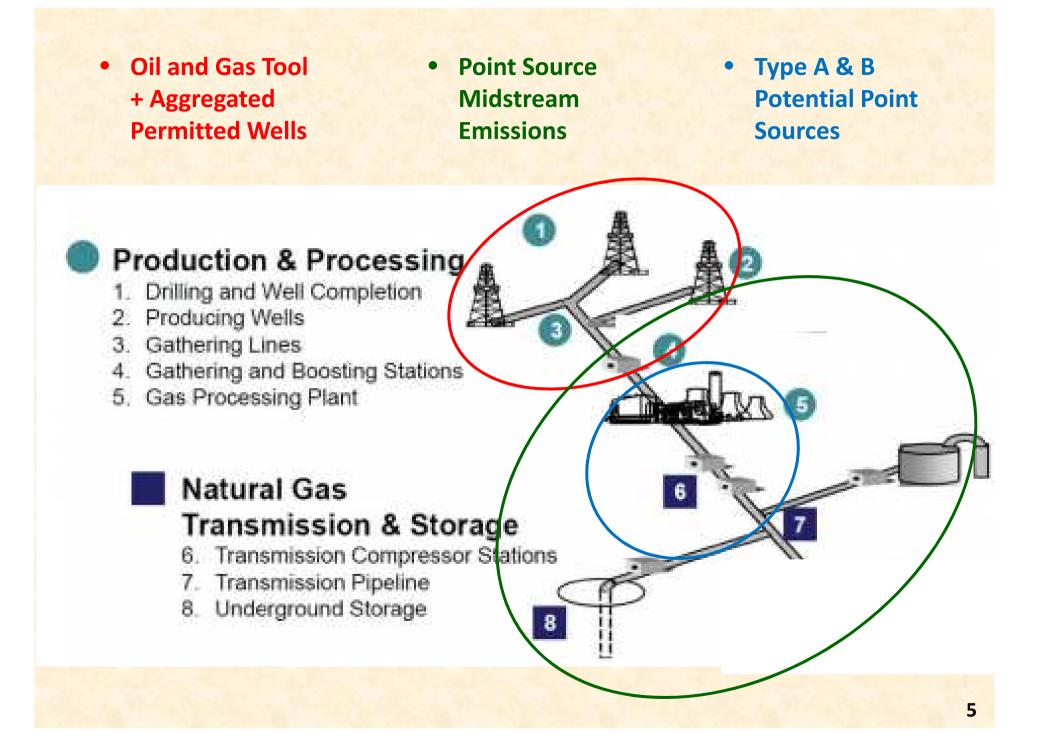
• Jennifer Snyder

Oklahoma Oil & Gas NEI Submission History

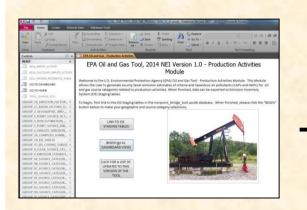
	Before 2008	2008 NEI	2011 NEI	2014 NEI
Wellhead	Not Inventoried	CENRAP Study	Oil & Gas Tool	Oil & Gas Tool + Aggregated Permitted Wells
Midstream	Minor Facilities Not Reported	Aggregated Midstream Emissions	Point Source Midstream Emissions	Point Source Midstream Emissions
Major Point Sources	Type A & B Actuals	Type A & B Actuals	Type A & B Potential	Type A & B Potential



Source: (EPA 2014a)



Oklahoma Area Source Oil & Gas Production Emissions



2014 O&G Production Tool

SHAMROCK GAL	S ANALYSIS 5, 1515	MARTINE A	
LABORATORY REFERENCE N			
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Oklahoma Changes

IS Gateway	Dalla Chimadita
VIEW/ADD/EDIT	Emissions Inventory System
Facility Inventory and Point	Welcome To EIS
Potential Duplicate Facilities	CURRENT ANNOUNCEMENTS
Nonpoint/ Onroad/ Nonroad missions	NP Survey Temporarily Closed
Event Emissions	There is currently an issue with being able to save some sectors in the Non-Point Survey. We are working now to correct the problem. We will let you know when the survey is ava
NCD Activity Data	POSTED BY JONATHAN MULER ON 2016-03-23 03 38 PM
CDB Activity Data	2014 TRI emissions loaded to EIS
REPORTS	The 2014 emissions reported to EPA's Toxics Release Inventory have been loaded to their respective EIS facilities. The TRI emissions are only used in the NEI where the pollutar agency for any emission process at that EIS facility.
Request Reports	Posted BY Ron RVAN ON 2016-03-15 09 26 AM
Report Downloads	Retirement of Point Source SCCs after 2015 inventory
Large File Download	As part of EPA's work to develop MACT emission standards and collect emission test data from those sources. The SCC codes for several industrial source categories have been
Feedback Reports	March 4, 2016, several hundred SCCs have been designated to be retired. Emissions submittals to EIS for these SCCs will be accepted for the 2015 inventory year, but will not be the SCCs being retired can be obtained from the EIS Gateway, by going to "Reporting Code Tables", "Source Classification Code", and filtering for Retired Codes, with a Last Inve
Nonpoint Survey	subset of SCC codes will provide a current SCC code that can be used, if there is a reasonable unique mapping that can be made. The SCCs being retired are in 19 Chemical Ma Engineered Wood Products sectors.
Agency Submission History Report	
REFERENCE DATA	Posteb ev Rox Rvax ox 2016-03-06 10 23 PM
Reporting Code Tables Augmentation Factors by SCC	User Trg_:reviewing on-line Galeway edis: several port emposition data unimites have been using the EIS Observa to make 2 or 3 single edits to moveported emissions values. Be assess that you will be able to see the are variently the process-level emissions screen, but that if you look at the scalar you and or related to end the data of the data of you look at the scalar you and the related to the data of the data of you will be able to be the will be able to be the scalar you will be able to
Inventory Cycle Management	POSTED BY RON RYAN ON 2016-02-25 04 58 PM
Software and Tools	View 38 Antonio reamonte

2014 NEI Area Oil and Gas Submission to EIS

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Point Source Inventories from Permitted Wellheads

# Oklahoma Modifications: What is Different?

- OKDEQ Gas Composition: We used gas composition data for the 15 counties where we had sufficiently representative data
- Pneumatic Devices: We incorporated the results of an Oklahoma Independent Petroleum Association (OIPA) study on pneumatic devices performed in Oklahoma (normal operations + malfunctions)
- Wellhead Point Source Inventory Data: We incorporated point source inventory data from over 4,000 oil and gas wellheads into our area source submission
  - This number of wells and their associated activity was removed from the Tool

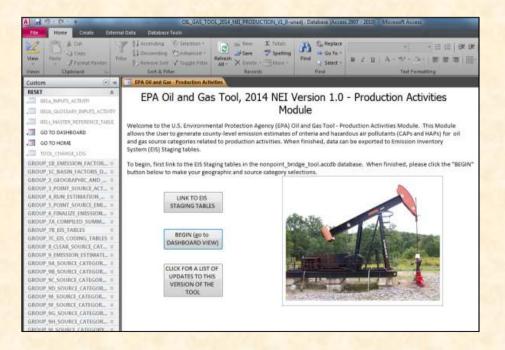
# Area Oil & Gas Emissions Estimation Tool

- **Goal:** To capture the best estimate of criteria pollutant and HAP emissions from the Production oil and gas sector across the state of Oklahoma
  - Involved many runs of the tool, and manipulation of the staging tables
  - Main objective: prioritize getting point source emissions into the final staging table over perfecting the point to nonpoint crosswalk (TONS matter more than SCCs)
  - EPA/ERG performed HAP augmentation to better characterize HAP emissions from OK point (and nonpoint) sources

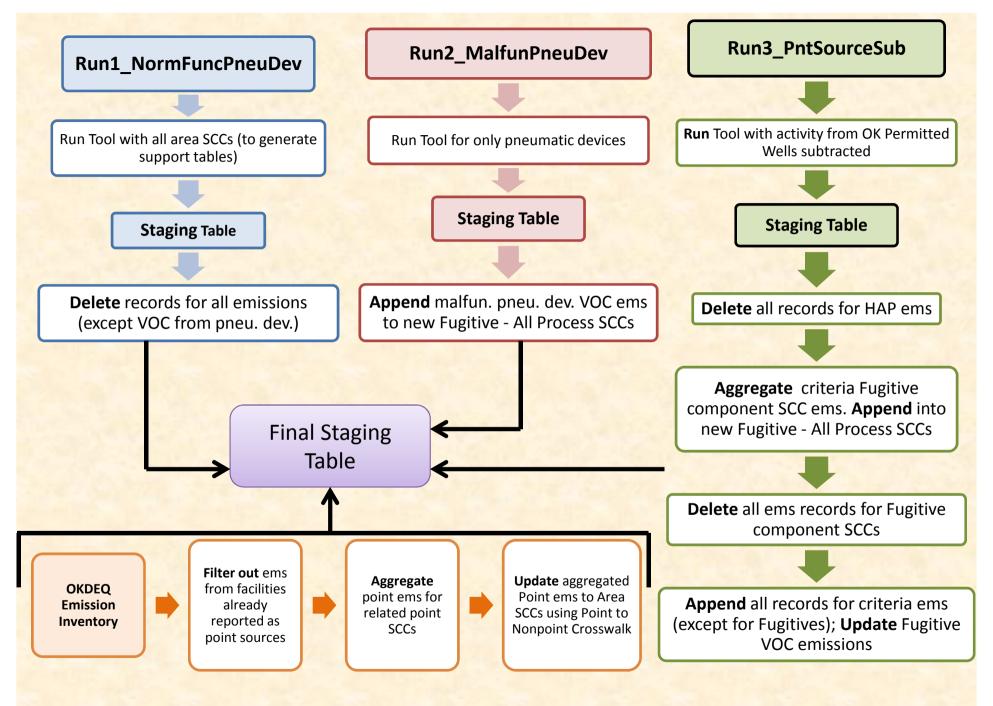
#### **Overview of Our Approach**

- Tool Scenario Runs: Running the O&G tool with different source categories, basin factors, speciation profiles, etc.
- Procedures: Adding emissions from the different scenario runs, and from the OKDEQ point emission inventory to the final staging tables
- Analysis: Examine VOC & NOx emission totals and the differences between permitted wells and unpermitted wells

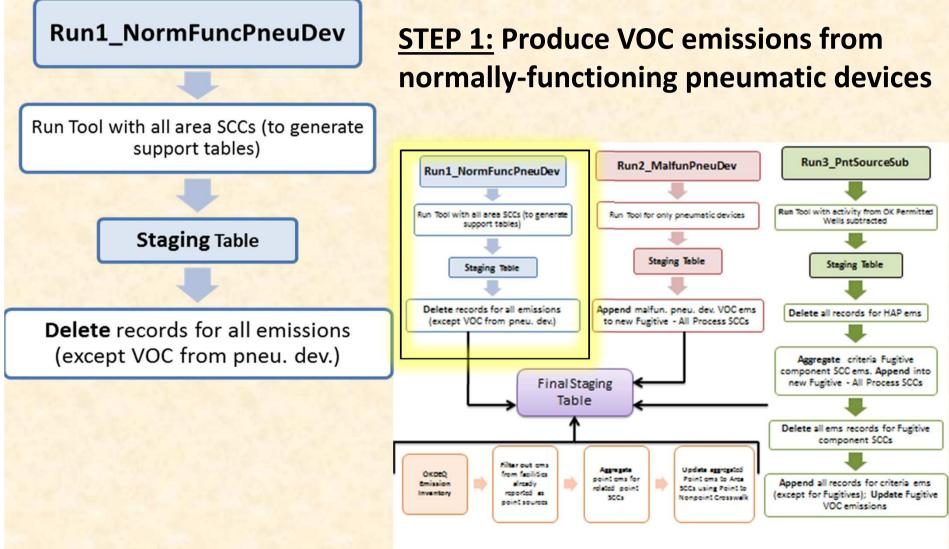
# **Tool Scenario Runs**







### Run1_NormFuncPneuDev



#### Run1_NormFuncPneuDev

- Run of the tool that generates emissions from normally functioning pneumatic devices
- Includes:
  - OKDEQ local gas composition data (speciation profiles for pneumatic devices)
  - Pneumatic device basin factor data for normally functioning pneumatic devices (OIPA, 2014)
  - Running all area SCCs to generate support tables; only emissions from normally functioning pneumatics are kept

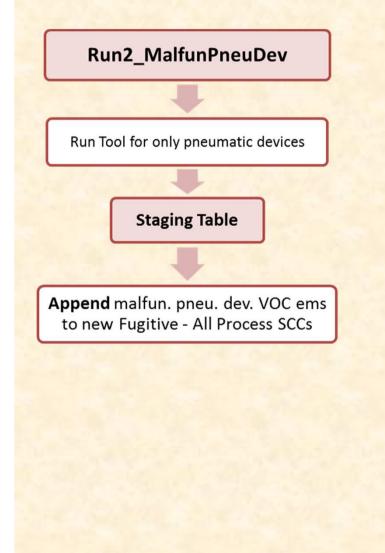
### Run1_NormFuncPneuDev

BASIN FACTOR - DATA_CATEGORY	CURRENT_VALUE	CURRENT_REFERENCE	
Number of No Bleed devices (COUNT)		OIPA_STUDY_2014	
Bleed rate, No Bleed devices (SCF/HR/DEVICE)		OIPA_STUDY_2014	OIPA Basin
Number of Low Bleed devices (COUNT)		OIPA_STUDY_2014	<b>Factors:</b> for
Bleed rate, Low Bleed devices (SCF/HR/DEVICE)		OIPA_STUDY_2014	normally
Number of High Bleed devices (COUNT)		OIPA_STUDY_2014	functioning
Bleed rate, High Bleed devices (SCF/HR/DEVICE)	-	OIPA_STUDY_2014	l l
Number of Intermittent Bleed devices (COUNT)	3.6	OIPA_STUDY_2014	pneumatic
Bleed rate, Intermittent Bleed devices (SCF/HR/DEVICE)	1.05	OIPA_STUDY_2014	devices.

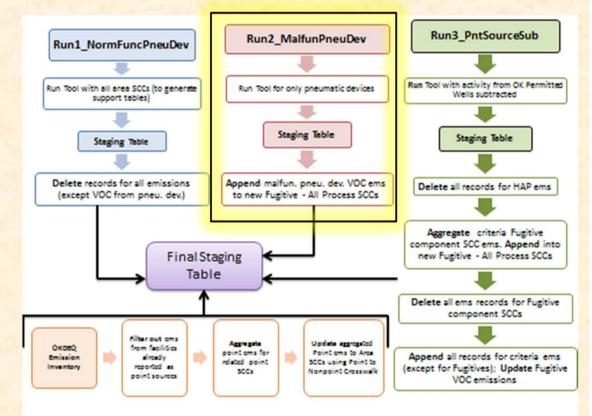
OKDEQ Speciation Profiles: calculated only for counties with at least 10 unique sales gas composition analyses

County	Reference	Alfalfa
MW of vented gas (G/MOL)	OKDEQ_STUDY_2015	19.87562
Wt Frac VOC	OKDEQ_STUDY_2015	0.17202
Wt Frac H2S	OKDEQ_STUDY_2015	0.00000
Wt Frac CO2	OKDEQ_STUDY_2015	0.01119
Wt Frac CH4	OKDEQ_STUDY_2015	0.68427
Wt Frac Benzene/VOC	OKDEQ_STUDY_2015	0.00000
Wt Frac E-Benzene/VOC	OKDEQ_STUDY_2015	0.00000
Wt Frac Toluene/VOC	OKDEQ_STUDY_2015	0.00000
Wt Frac Xylene/VOC	OKDEQ_STUDY_2015	0.00000
Wt Frac CH4/VOC	OKDEQ_STUDY_2015	4.21549
Wt Frac H2S/VOC	OKDEQ_STUDY_2015	0.00000

#### Run2_MalfunPneuDev



**STEP 2:** Add VOC emissions from malfunctioning pneumatic devices to Fugitives: All Process SCCs



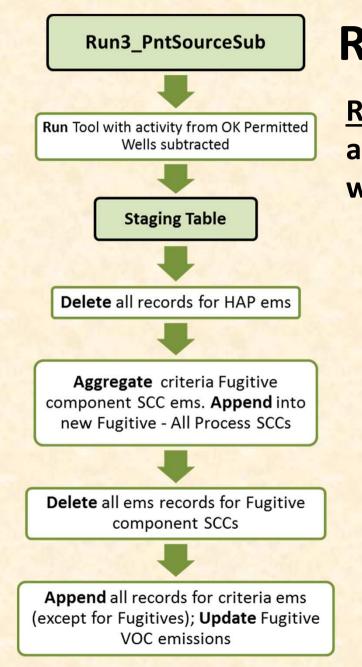
#### Run2_MalfunPneuDev

- Run of the tool that generates emissions from malfunctioning pneumatic devices
- The emissions are aggregated to fugitive SCCs and added to the final staging table
- Includes:
  - ONLY pneumatic device SCCs
  - Pneumatic device basin factor data for malfunctioning pneumatic devices (OIPA, 2014)

#### Run2_MalfunPneuDev

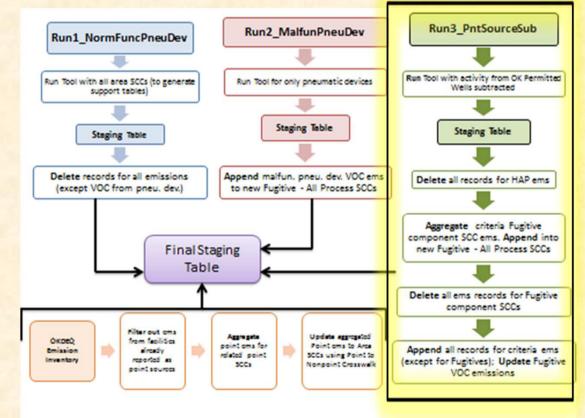
BASIN FACTOR - DATA_CATEGORY	CURRENT_VALUE		CURRENT_REFERENCE
Number of No Bleed devices (COUNT)			OIPA_STUDY_2014
Bleed rate, No Bleed devices (SCF/HR/DEVICE)			OIPA_STUDY_2014
Number of Low Bleed devices (COUNT)			OIPA_STUDY_2014
Bleed rate, Low Bleed devices (SCF/HR/DEVICE)			OIPA_STUDY_2014
Number of High Bleed devices (COUNT)			OIPA_STUDY_2014
Bleed rate, High Bleed devices (SCF/HR/DEVICE)		Ļ	OIPA_STUDY_2014
Number of Intermittent Bleed devices (COUNT)	3	.6	OIPA_STUDY_2014
Bleed rate, Intermittent Bleed devices	2.0		OIPA_STUDY_2014;
(SCF/HR/DEVICE)	2	.0	Allen_Study_2014

**OIPA Basin Factors:** for **malfunctioning** pneumatic devices. (Emissions from normally operating pneumatic devices were generated from the previous run.)



## Run3_PntSourceSub

<u>RUN 3:</u> Subtract permitted wellhead activity; accounts for unpermitted wellhead emissions



### Run3_PntSourceSub

- Subtraction of:
  - AERR type A &B point source activity
  - OKDEQ permitted/inventoried well activity that have matched API numbers in the HPDI database
- Emissions after the point source subtraction are added to the final staging table
- Includes:
  - All SCCs EXCEPT pneumatic devices
  - OKDEQ local gas composition data (speciation profiles for fugitives, gas-actuated pumps, and liquids unloading)

#### Run3_PntSourceSub (Fugitive Components)

- Our point inventory contained inconsistent characterizations of fugitive SCCs. We felt it did not justify the level of granularity shown in the Tool.
- Aggregate fugitive component emissions by well type, then append into new Fugitives: All Process SCCs

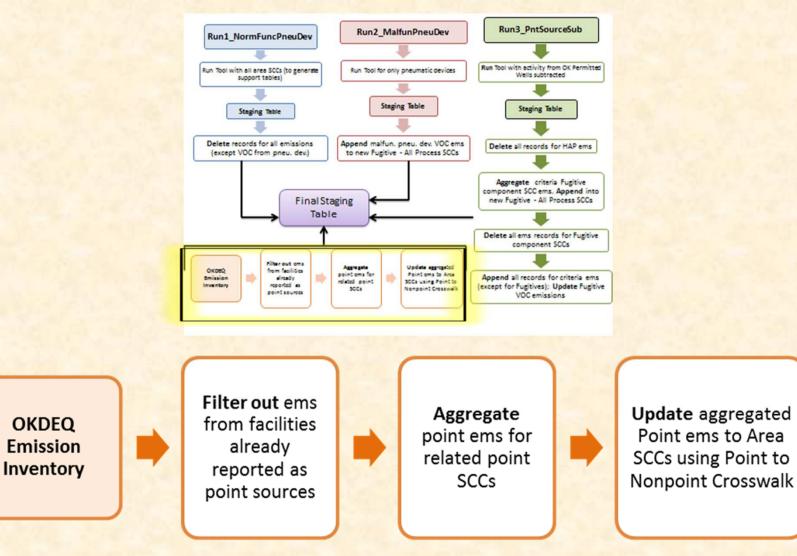
	Gas Wells	CBM Wells	Oil Wells
Connectors	2310021501	2310023511	2310011501
Flanges	2310021502	2310023512	2310011502
Open Ended Lines	2310021503	2310023513	2310011503
Valves	2310021505	2310023515	2310011505
Other	2310021506	2310023516	N/A
$\checkmark$	+	$\checkmark$	$\checkmark$
All Process	2310021509	2310023509	2310011500

• Delete all fugitive component SCC records in the Emissions and EmissionsProcess table

# Comparison: OKDEQ Point Source Activity Data

	OKDEQ TOTAL Permitted Wells (HPDI)		% Point
Total Liquids (BBL)	55,901,885	117,319,665	48%
Total Gas (MCF)	713,638,549	2,162,187,694	33%
# Oil Wells	3,397	21,060	16%
# Gas Wells	843	31,395	2.7%
# CBM Wells	66	3,113	2.1%

- Note the range in coverage
- OKDEQ permitted wells capture:
  - Almost 50% of the total liquids production, but only 16% of oil wells
  - 33% of the total gas production and less than 3% of gas wells



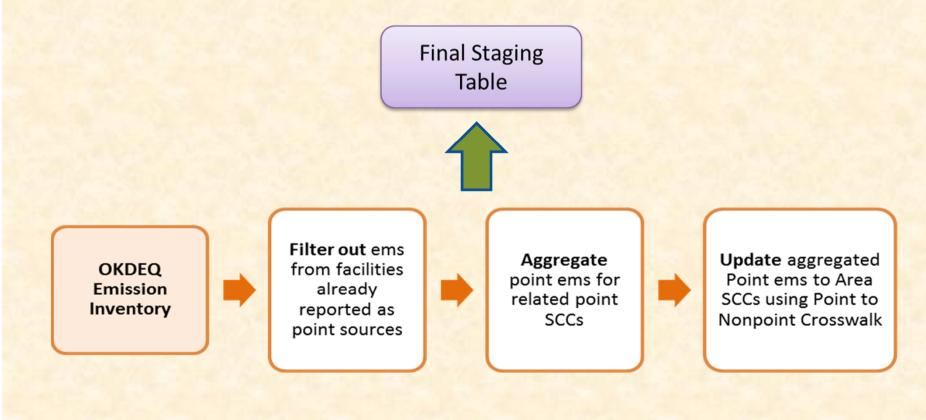
- Not a run of the Tool, but the process of mapping our permitted wellhead emission data into the final staging table
  - After filtering out facilities in our inventory that had already reported as AERR Type A and B sources, we aggregated the remaining point emissions by SCC grouping, pollutant, and well type
  - Grouped point SCCs are cross-walked to area SCCs
  - Emissions are added to the final staging table

# **Step 4 Aggregate Point Emissions, Tanks**

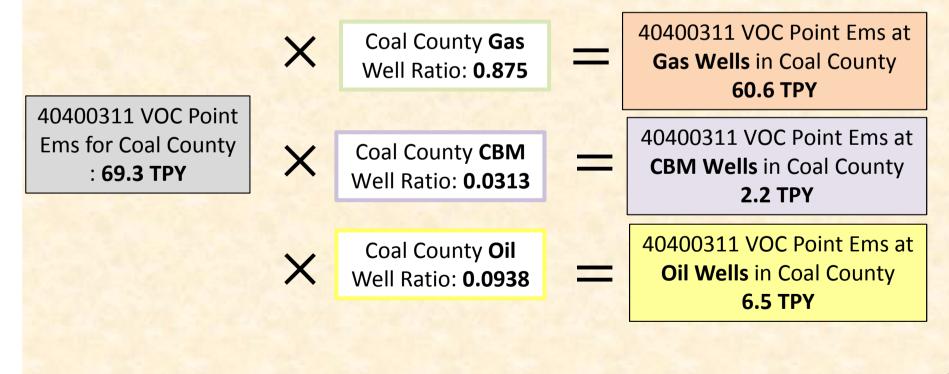
List of Point SCC emissions aggregated in preparation for mapping to tank area SCCs

Count	SumOfEms (TPY)	Point SCC	PointSCC_L4
7107	8811.321	40400311	Fixed Roof Tank, Condensate, working+breathing+flashing losses
1152	5684.968	40400300	Fixed Roof Tank: Flashing Loss
797	1217.975	40400312	Fixed Roof Tank, Crude Oil, working+breathing+flashing losses
1039	1160.008	40400302	Fixed Roof Tank: Working Loss
1191	938.866	40400301	Fixed Roof Tank: Breathing Loss
1304	818.29	31000205	Flares
256	143.975	31000160	Flares
341	16.352	31000215	Flares Combusting Gases : 1000 BTU/scf
11	16.215	30600903	Natural Gas

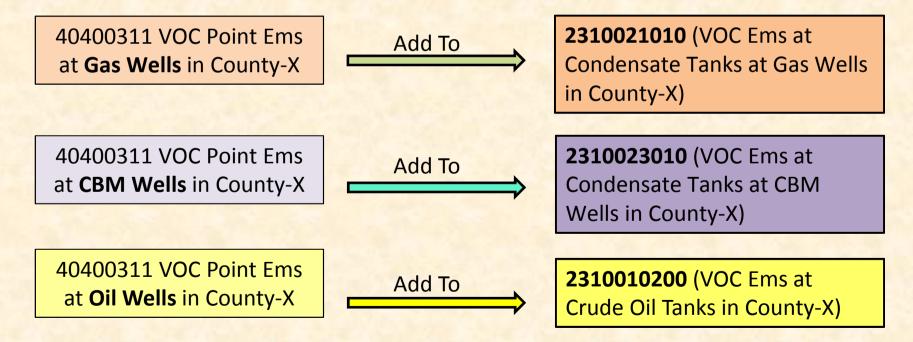
Once point emissions were aggregated into a chosen group, they were allocated to gas, oil, and CBM wells in each county using well-type ratios



Allocate point emissions by well type using well type ratios (HPDI county averages for the permitted wellheads) ex. 40400311 - Coal County



Using a **point to nonpoint SCC crosswalk**, we added the well-type allocated point emissions to a related nonpoint SCC that was present in the Oil & Gas Tool



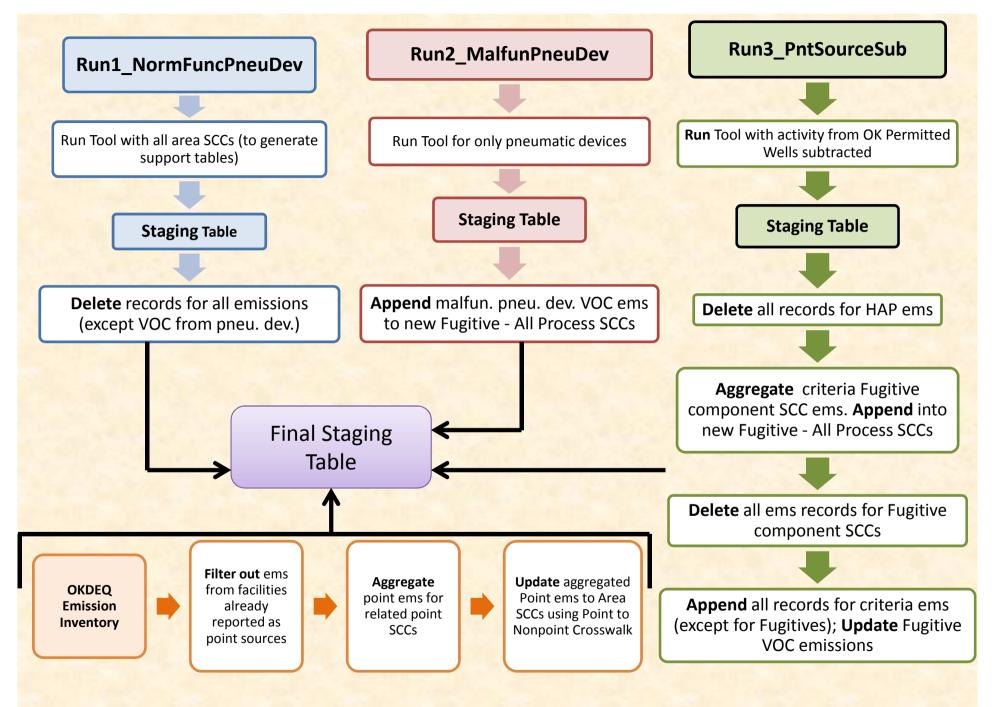
#### **Point to Nonpoint Crosswalk**

Point_SCC	Gas Wells, Nonpoint SCC	CBM Wells, Nonpoint SCC	Oil Wells, Nonpoint SCC	Other, Nonpoint SCC	Pollutants	
40400311 Tanks & Flares	2310021010 Condensate Tanks	2310023010 Condensate Tanks	2310010200 Crude Oil Tanks	N/A	VOC, $NO_x$ , CO, $SO_x$ , $PM_{10}$ , $PM_{2.5}$	
20200253 4-Cycle Rich	2310021302 4-cycle Rich	2310023302 4-cycle Rich	2310000330 Artificial Lift	N/A	VOC, $NO_x$ , CO, $SO_x$ , $PM_{10}$ , $PM_{2.5}$	
20200254 4-cycle Lean	2310021202 4-cycle Lean	2310023202 4-cycle Lean	2310000330 Artificial Lift	N/A	VOC, $NO_x$ , CO, $SO_x$ , $PM_{10}$ , $PM_{2.5}$	
20200252 2-cycle Lean	2310021102 2-cycle Lean	2310023102 2-cycle Lean	2310000330 Artificial Lift	N/A	VOC, $NO_x$ , CO, $SO_x$ , $PM_{10}$ , $PM_{2.5}$	
20200202	2310021302 4-cycle Rich	cycle Rich 4-cycle Rich 2310000330	N/A	VOC, NO _x , CO,		
Unspecified Engines	2310023202 4-cycle Lean	<b>2310023202</b> 4-cycle Lean	Artificial Lift	N/A	N/A	$SO_x$ , $PM_{10}$ , $PM_{2.5}$

These are 50-499 HP Engine Area SCCs. In reality, some of the engines we inventory will have HP outside of this range. 28

### **Point to Nonpoint Crosswalk Cont.**

	Point_SCC	Gas Wells, Nonpoint SCC	CBM Wells, Nonpoint SCC	Oil Wells, Nonpoint SCC	Other, Nonpoint SCC	Pollutants
	31000220 Fugitives	2310021509 Fugitives All Process	2310023509 Fugitives All Process	2310011500 Fugitives	N/A	VOC
	40400250 Loading Racks	310021030 Tank Truck & Railcar Loading: Condensate	2310023030 Tank Truck & Railcar Loading: Condensate	2310011201 Tank Truck & Railcar Loading: Crude Oil	N/A	VOC
No No No	31000404 Process Heaters	2310021100 Gas Well Heaters	2310023100 CBM Well Heaters	2310010100 Heater Treaters	N/A	VOC, $NO_x$ , CO, $SO_x$ , $PM_{10}$ , $PM_{2.5}$
	40400315 Tanks, Produced Water	N/A	N/A	N/A	23100005 50 Produced Water	VOC
	31000227 Dehydrators	2310021400 Dehydrators	N/A	N/A	N/A	VOC, $NO_x$ , CO, $SO_x$ , $PM_{10}$ , $PM_{2.5}$



### **Final Comparison Analysis**

Pollutant	Run with EPA defaults – The Oil and Gas tool v2.1 without any point source subtraction or other alteration	Final Run - Total emissions from the final staging table of the flow chart procedures.
NOx (tons)	41,300	54,900
VOC (tons)	148,900	162,300

# Comparison of Emissions per Well (Nonpoint vs. Point)

	2014 O&G Tool v1.0 w/o Modifications	Oklahoma Permitted Wells		
Total Number of Wells (Oil, Gas, & CBM Combined)	55,568	4,306		
Total Emissions				
NO _x (tons)	42,166	16,190		
VOC (tons)	147,984	38,836		
Per Well Emissions				
NO _x (tons/well)	0.759	3.760		
VOC (tons/well)	2.663	9.019		

#### **Remaining Questions/Concerns**

- Source Classification Code structure
  - Poor descriptions and missing codes
  - Crosswalk between point & nonpoint SCCs
- Definition of gas well vs. oil well
  - Reclassification of well types (affects where emissions are appearing and changes the emission factors in the tool)
  - Point source inventory mitigates this problem (e.g. 48% of liquids in OKDEQ point inventory)

### **OKDEQ Simple Sensitivity Analysis**

National Oil & Gas

http://vibe.cira.colostate.edu/ogec/docs/meet ings/2017-05-11/OKDEQ2014OGToolSensitivityAnalysis.pdf

The tool is sensitive to classification hydrocarbons as:

- Oil (crude and associated gas)
- Gas (condensate and gas well gas)

If "gas wells" (and their associated production) are classified in the Tool as "oil wells", VOC and NOx emissions would be underestimated.

DEC	Decen	nber 30, <mark>2016</mark>	
DRAFT MEN	IORANDUM		
SUBJECT:	Sensitivity of the 2014 Oil and Gas Emissions Tool to Gas/Oil Classificat	ion	
TO:	John Grant and Amnon Bar-Ilan (Ramboll-Environ); Tom Moore (WESTAR-WRAP); Theresa Pella (CenSARA); and Jennifer Snyder (EPA OAQPS)		
FROM:	Louise Esjornson, Tom Richardson, and Carrie Schroeder (OK DEQ, Air o	Quality Divisio	
However, on	e 2014 Oil and Gas Emissions Tool is a significant improvement over the 2 e area of concern is the change in the method used to characterize each w e change in classification of production based on well type (i.e. oil/conden	ell as either g	
issions	Committee Information Repository	er: s produced	
lity and equipme	vity data for O&G drilling and production; hydrocarbon containing geologic ent type; emissions inventories; emissions modeling; tools for data access, inquiry and reports on the "state of the science" of O&G emissions inventories and	ell. vith a sas-t	

This website is a national repository for the following types of information: activity data for O&G drilling and production; hydrocarbon containing geologic formations; emission factors and chemical composition by facility and equipment type; emissions inventories; emissions modeling; tools for data access, inquiry and analysis; regulatory programs; NEPA planning process; literature articles and reports on the "state of the science" of O&G emissions inventories and emissions modelino.



# Remaining Questions/Concerns (Continued)

- Better Characterizing Super-Emitters
- Reconciling Top-Down vs Bottom-Up Estimates
- Closing the Midstream Gap
- Identifying and Characterizing Other Missing Sources

http://www.ladco.org/about/general/Air Quality W orkshop Meeting 2016/6.2 Gibbs OKDEQ -The Future of Oil and Gas Inventories 6-20-16.pdf



# Questions?

Carrie Schroeder Oklahoma DEQ, Emission Inventory <u>Carrie.Schroeder@deq.ok.gov</u>



O K L A H O M A DEPARTMENT OF ENVIRONMENTAL QUALITY