

Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2019: Updates for Produced Water Emissions

This memorandum discusses the updates implemented in EPA's 2021 *Inventory of U.S. Greenhouse Gas Emissions and Sinks* (GHGI) for produced water emissions within the natural gas and petroleum systems production sectors. Additional considerations for produced water were previously discussed in a memorandum released in September 2020 (*Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2019: Updates Under Consideration for Produced Water Emissions*).¹

1 Background and 2020 (Previous) GHGI Methodology

EPA's definition of produced water is: "the water (brine) brought up from the hydrocarbon-bearing strata during the extraction of oil and gas, and can include formation water, injection water, and any chemicals added downhole or during the oil/water separation process".² Produced water is the largest wastewater source by volume generated during oil and gas extraction. The ratio of produced water to recovered hydrocarbon is extremely variable across the U.S. ranging from less than 1:1 to more than 100:1.³ Produced water is also referred to as "production salt water" – the specific salinity of produced water is quite variable and is dependent upon the formation's geochemistry. The Bakken and Marcellus shale formations can have produced waters that have 10 times the salinity of seawater, while other areas may have produced water that is considerably less saline than seawater.^{4,5}

In the 2020 (previous) GHGI, the emission calculation methodology for emissions from produced water in the Natural Gas Systems sector was limited to two individual coal bed methane (CBM) formations: Powder River Basin (in Wyoming) and Black Warrior Basin (in Alabama). The 2020 (previous) GHGI emission calculation methodology used relevant activity data multiplied by emission factors.

1.1 Activity Data

For the Powder River Basin, EPA obtained produced water production data from the Wyoming Oil and Gas Conservation Commission (WOGCC) in units of barrels per month.⁶

For the Black Warrior Basin, EPA obtained monthly producing well counts (beginning in April 1996) from the Alabama Oil and Gas Board (AOGB).⁷ From the monthly data, EPA calculated annual average well counts beginning in 1996. EPA obtained annual well counts for the Black Warrior Basin for 1990 and 1994 from a Gas Research Institute (GRI) technical document.⁸ EPA then developed annual well count estimates for 1991, 1992, 1993, and 1995 by scaling the 1994 annual well count with coalbed methane production. EPA used 2013 data as proxy data for all subsequent years (i.e., 2014 through 2018).

Table 1 presents the applicable activity data for the Powder River Basin and the Black Warrior Basin, for select years from the 2020 (previous) GHGI methodology.

¹ Stakeholder materials including draft and final memoranda for the current 1990-2019 Inventory and previous Inventories are available at <https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems>.

² 40 CFR §435.11(bb).

³ *Summary of Input on Oil and Gas Extraction Wastewater Management Practices Under the Clean Water Act*. Final Report. EPA-821-S19-001. U.S. Environmental Protection Agency, Engineering and Analysis Division, Office of Water. Washington, D.C. May 2020.

⁴ "What is produced water?" American Geosciences Institute. Internet address: <https://www.americangeosciences.org/critical-issues/faq/what-produced-water>

⁵ *Natural Produced Waters Geochemical Database*. U.S. Geological Survey (USGS). Internet address: <https://eerscmapp.usgs.gov/pwapp/>

⁶ Wyoming Oil and Gas Conservation Commission (WOGCC). Internet address: <http://pipeline.wyo.gov/coalbedchart.cfm>

⁷ Alabama Oil and Gas Board (AOGB). Internet address: <https://www.ogb.state.al.us/>

⁸ *A Guide to Coalbed Methane Reservoir Engineering*. GRI-94/0397. Gas Research Institute. 1996

Table 1. 2020 (Previous) GHGI Produced Water Activity Data

Basin	1990	2005	2014	2015	2016	2017	2018
Powder River (10 ⁶ gallons produced water)	25	23,422	12,670	12,670	12,670	12,670	12,670
Black Warrior (wells)	1,300	4,246	5,480	5,480	5,480	5,480	5,480

1.2 Emission Factors

For the Powder River Basin, the 2020 (previous) GHGI applied a base emission factor (EF) of 2.0522×10^{-9} Gg CH₄/gallon of water drainage. For the Black Warrior Basin, the 2020 (previous) GHGI applied a base EF of 2.0694×10^{-3} Gg CH₄/well. These values were developed using an assumed methane concentration in water of 542.9 mg/l (or 0.19 lbs/bbl) at 700 foot well depth. Additional details on these EFs are unavailable. The EFs were then adjusted by the year-specific methane contents for the Rocky Mountain and Gulf Coast regions, respectively.

Table 2 shows the EFs for the Powder River Basin and the Black Warrior Basin, for select years.

Table 2. 2020 (Previous) GHGI Produced Water Emission Factors

Basin	1990	2005	2014	2015	2016	2017	2018
Powder River (Gg CH ₄ /gallon water)	1.744×10^{-9}	2.135×10^{-9}	2.313×10^{-9}	2.328×10^{-9}	2.373×10^{-9}	2.373×10^{-9}	2.373×10^{-9}
Black Warrior (Gg/well)	2.096×10^{-3}	2.327×10^{-3}	2.334×10^{-3}	2.334×10^{-3}	2.335×10^{-3}	2.335×10^{-3}	2.335×10^{-3}

1.3 Emissions

Combining the produced water activity data (presented in Section 1.1) with the produced water emission factors (presented in Section 1.2) resulted in the emissions for the Powder River Basin and the Black Warrior Basin, for select years as shown in Table 3.

Table 3. Produced Water CH₄ Emissions (metric tons)

Basin	1990	2005	2014	2015	2016	2017	2018
Powder River	43	50,005	47,638	47,957	48,877	48,877	48,877
Black Warrior	2,724	9,879	12,790	12,788	12,796	12,796	12,796
Total	2,768	59,884	60,428	60,745	61,674	61,674	61,674

2 Analysis of Available Data

The details of available data for the update (i.e., both activity data and emission factors) are described below.

2.1 Activity Data

EPA reviewed the 2017 Nonpoint Oil and Gas Emission Estimation Tool (2017 Oil and Gas Tool)⁹ to assess produced water activity data. For the 2017 Oil and Gas Tool, EPA developed source category emission

⁹ 2017 Nonpoint Oil and Gas Emission Estimation Tool, Version 1.2. Prepared for U.S. Environmental Protection Agency by Eastern Research Group, Inc. (ERG), Morrisville, North Carolina. October 2019.

estimation methodologies for 19 individual source categories; one of these source categories is produced water tanks. The activity parameter used for the produced water tanks source category was produced water production at oil wells and produced water production at gas and CBM wells; produced water production quantities are in units of barrels per year (bbl/year).

The primary data source in the 2017 Oil and Gas Tool for produced water production quantities is Enverus data, but additional data sources are used for some states. The 2017 Oil and Gas Tool used the following sources of produced water activity data:

- Enverus – 27 states (i.e., Alabama, Alaska, Arizona, Arkansas, California, Colorado, Florida, Kentucky, Louisiana, Michigan, Mississippi, Missouri, Montana, Nebraska, Nevada, New Mexico, New York, North Dakota, Ohio, Oklahoma, Oregon, South Dakota, Tennessee, Texas, Utah, Virginia, and Wyoming)
- State oil and gas commissions – 3 states (i.e., Idaho, Indiana, and Pennsylvania)
- State environmental agencies – 1 state (i.e., Kansas)
- Multiple sources – 3 states (i.e., Illinois [state oil and gas commission and EIA], Maryland [Enverus DrillingInfo and Energy Information Administration], and West Virginia [Enverus DrillingInfo and state environmental agency])

In general, the sources of produced water roughly parallel the sources of well counts used in the annual GHGI.

Table 4 presents the “Current Values” (i.e., year 2017 volumes) for produced water and the “Previous Values” (i.e., year 2014 volumes) for produced water, as shown in the Production Module of the 2017 Oil and Gas Tool¹⁰:

Table 4. 2017 NEI Production Water Volumes (bbl)

Well Type	Previous Value (Year 2014)	Current Value (Year 2017)
CBM Wells	512,318,013	378,446,711
Gas Wells	973,980,331	1,113,855,869
Oil Wells	15,545,896,708	15,858,915,589

Compared to the “Previous Values” (i.e., year 2014 volumes) for produced water from the 2017 Oil and Gas Tool Production Module, the year 2017 total produced water quantities increased by 1.9% (i.e., CBM decreased by 26.2%, gas increased by 14.4%, and oil increased by 2.0%).

For the update, EPA assessed Enverus data and the other datasets to estimate produced water volumes over the GHGI time series. EPA also combined data for gas wells and CBM wells to develop a single produced water volume applicable to all gas wells.

2.2 Emission Factors

There are a number of documents that address produced water emissions; however, the EFs used in all of these documents all ultimately trace back to a 1996 Gas Research Institute (GRI)/EPA study.¹¹ Table 5 is an extract of Table 5.5 from that document which presents methane emissions from production salt water (i.e., produced water) tanks. The emission estimates were estimated using an ASPEN PLUS process simulation, rather than actual measurements. Three key assumptions used in this simulation are as follows:

¹⁰ See Footnote 8.

¹¹ *Methane Emissions from the Natural Gas Industry, Volume 6: Vented and Combustion Source Summary, Final Report*. GRI-94/0257.23 and EPA-600/R-96-080f. Gas Research Institute and U.S. Environmental Protection Agency. June 1996.

- The natural gas industry produces 497 million barrels of salt water annually, including approximately 100 million barrels from coal bed methane wells.¹²
- 70 percent of the water from gas wells is reinjected with the remaining 30 percent stored in atmospheric tanks.¹³
- Hydrocarbon composition is 100 percent methane.

Table 5. Salt Water Tank Emissions from 1996 GRI/EPA Study

Salt Content (Wt %)	Pressure (psi)	Methane Emissions (10 ⁶ lb/yr)
20	50	1.6
	250	10.8
	1000	38.8
10	250	16.4
	1000	58.7
2	250	19.4
	1000	69.5

More recently, the 1996 GRI/EPA study produced water EFs shown in Table 5 were incorporated into the API *Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry*.¹⁴ Within the API *Compendium* (Table 5-10), the presentation of EFs were rearranged and the units were converted from units of million pounds per year to units of metric tons per thousand barrels, based upon the annual U.S. total of 497 million barrels of produced water cited in the 1996 GRI/EPA study. In addition, average EFs were calculated for each pressure (i.e., 50, 250, and 1,000 psi). Table 6 reproduces the EFs from the API *Compendium* (Table 5-10). This identical table is also included in a guidance document developed by The Climate Registry.¹⁵

Table 6. Produced Salt Water Tank Methane Flashing Emission Factors from API Compendium

Separator Pressure (psi)	Produced Water Salt Content (%)	EF (GRI/EPA initial units – 10 ⁶ lb CH ₄ /year)	Converted EF (metric tons/ 1000 bbl produced water) ^a
50	20	1.6	0.0015
250	20	10.8	0.00986
	10	16.4	0.0150
	2	19.4	0.0177
	Average ^b	–	0.0142
1000	20	38.8	0.0354
	10	58.7	0.0536
	2	69.5	0.0634
	Average ^b		0.0508

^a Converted EFs calculated based on 497 million barrels of produced water generated annually.

^b Average EFs calculated based on a simple average of EFs for 2, 10, and 20 percent produced water salt content.

¹² *Atlas of Gas Related Produced Water for 1990*. 95/0016. Produced by Energy Environmental Research Center, University of North Dakota, and ENSR Consulting and Engineering for Gas Research Institute. May 1995.

¹³ See Footnote 12.

¹⁴ *Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry*. Produced by URS Corporation for American Petroleum Institute. August 2009

¹⁵ *Oil & Gas Production Protocol, Annex II to the General Reporting Protocol*, Version 1.0. The Climate Registry. February 2010.

An early oil and gas emission inventory that included produced water emissions was the 2011 CenSARA Oil and Gas Emission Inventory.¹⁶ The 2011 CenSARA inventory cited the produced water emission factors included in The Climate Registry document.

The Production Module of the 2017 Oil and Gas Tool¹⁷ cited the average produced water EFs used in the 2011 CenSARA Oil and Gas Emission Inventory. The average EFs were converted to units of pounds CH₄/barrel produced water and assigned to specific well types. Table 7 summarizes the produced water EFs used in the 2017 Oil and Gas Tool. The 2017 Oil and Gas Tool applies the “low pressure oil wells” EF to oil wells that require an artificial lift to increase production. Most counties in the 2017 Oil and Gas Tool used a default average of 73 percent of oil wells using an artificial lift; this average is based on CenSARA data.

Table 7. Produced Water Emission Factors, by Well Type, from 2017 Oil and Gas Tool

Well Type	Separator Pressure (psi)	Average CH ₄ EF (lb/bbl)
Low Pressure Oil Wells	50	0.0033
Regular Pressure Oil Wells	250	0.0313
Gas and CBM Wells	1000	0.112

Finally, various recent technical analyses of the U.S. oil and gas supply chain^{18,19,20} cite the produced water EFs described above.

For the update, EPA applied the average EFs presented in Table 7. To estimate gas well produced water emissions, EPA applied the “gas and CBM wells” EF of 0.112 lb/bbl. For comparison, the previous GHGI EF (applied only to certain CBM formations) is 0.22 lb/bbl. To estimate oil well produced water emissions, EPA applied the “regular pressure oil wells” EF of 0.0313 lb/bbl and the “low pressure oil wells” EF of 0.0033 lb/bbl, based on the estimated population of wells that require an artificial lift. Data on the population of oil wells at various well pressures are unavailable.

3 Time Series Considerations

In general, produced water data for the entire time series are obtainable from the same datasets cited in the 2017 Oil and Gas Tool Production Module. In particular, Enverus data are available over the time series. However, those states that rely on non-Enverus data may not have produced water volumes readily available each year. For missing data in the middle of the time series, linear interpolation was used for gap filling.

4 National Emissions Estimates

Based on the data sources and considerations discussed in Sections 2 and 3, this section summarizes the approach EPA implemented in the 2021 GHGI. EPA used the following equation and applied the produced water volumes in Table 4, the EFs in Table 7, and a default average of 73 percent of oil wells use artificial lifts (see Section 2.2). Table 8 summarizes the resulting 2018 emissions estimates. Appendix A provides the

¹⁶ 2011 Oil and Gas Emission Inventory Enhancement Project for CenSARA States. Produced by ENVIRON International Corporation and Eastern Research Group, Inc. (ERG) for Central States Air Resources Agencies (CenSARA). December 2012.

¹⁷ Instructions for Using the 2017 EPA Nonpoint Oil and Gas Emissions Estimation Tool, Production Module. Produced by Eastern Research Group, Inc. (ERG) for U.S. Environmental Protection Agency. October 2019.

¹⁸ D. Zavala-Araiza et al., “Super-emitters in natural gas infrastructure are caused by abnormal process conditions”. *Nature Communications*. January 16, 2017.

¹⁹ R.A. Alvarez et al., Supplementary Materials for “Assessment of methane emissions from the U.S. oil and gas supply chain”. *Science*. June 21, 2018.

²⁰ J. Littlefield et al., *Life Cycle Analysis of Natural Gas Extraction and Power Generation*. DOE/NETL-2019/2039. National Energy Technology Laboratory. April 19, 2019.

complete time series of emissions for the 2021 GHGI update compared to the previous 2020 GHGI (Table A-1 for natural gas and Table A-2 for petroleum).

$$Emissions_w = PW_w \times EF_w \times \left(\frac{453.6\text{ g}}{1\text{ lb}}\right) \times \left(\frac{1\text{ metric ton}}{10^6\text{ g}}\right)$$

Where:

- Emissions_w = Annual produced water emissions from well type w (mt);
- PW_w = Annual produced water quantities from well type w (bbl); and
- EF_w = Emission factor for produced waste emissions from well type w (lb/bbl).

Table 8. Comparison of Year 2018 Produced Water National CH₄ Emissions Estimates (metric tons)

Well Type	Produced Water Volume (bbl)	EF (lb/bbl)	Year 2018 Emissions (mt)
2021 GHGI			
Oil Wells – Low Pressure	12,271,147,893	0.0033	18,368
Oil Wells – Regular Pressure	4,538,643,741	0.0313	64,438
Gas Wells	3,712,404,487	0.112	188,601
Total			271,407
2020 GHGI			
Powder River	490,393,575	0.22	48,877
Black Warrior	131,591,163	0.21	12,796
Total			61,674

The EFs presented in Section 2.2, including the Table 7 EFs implemented in the 2021 GHGI update, are documented with an assumption from the 1996 GRI/EPA study that 30 percent of generated produced water is stored in tanks while 70 percent is reinjected (see the assumptions underlying the emissions data at the beginning of Section 2.2). See discussion of stakeholder feedback below.

5 Requests for Stakeholder Feedback

EPA sought stakeholder feedback on the update under consideration through two 2020 workshops, in the September 2020 memo, and in the public review draft of the GHGI. EPA received feedback on this update through its September 2020 memo and through the public review draft of the Inventory. Feedback is summarized here.

A stakeholder supported using the same emission factors for produced water from natural gas wells and CBM wells, which was implemented by EPA. A stakeholder indicated the typical practice is to route produced water to a tank battery once it reaches the surface and has been separated from the oil and gas. A stakeholder also requested that data from the latest 2017 Ground Water Protection Council produced water management practices survey be used to determine the percent of produced water that is stored in tanks. The stakeholder indicated that approximately 16 percent of produced water has the potential of being stored in a tank battery that could potentially flash (based on the 2012 Ground Water Protection Council produced water management practices survey). After further assessment of the 2012 and 2017 water management practice surveys, EPA has maintained the approach in the proposed approach which incorporated an assumption that all produced water goes through tanks and emissions are flashed at that time.

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A stakeholder commented that current regulations under 40 CFR 60 subpart OOOOa require that certain storage vessels route emission vapors to a recovery device, flare, or other control device. Currently data are unavailable to assess the use of controls on produced water tanks but EPA will continue to assess this issue in future inventories should additional data become available.

The questions below were not updated for this memorandum and are copied from the September 2020 memo.

Questions to Stakeholders

EPA seeks stakeholder feedback on the approach under consideration and the questions below.

1. EPA seeks feedback on the fraction of oil wells that are low pressure, including whether it is reasonable to apply an average of 73 percent of oil wells using artificial lifts.
2. EPA seeks feedback on the percent of produced water that releases emissions (e.g., through tank flashing or evaporation in a pond), including whether the assumption that 30 percent of produced water undergoes tank flashing is reasonable.
3. EPA seeks feedback on updating the current GHGI EF for gas wells, currently applied to only certain CBM formations, to instead use the updated EF for all gas well produced water.

Appendix A: Produced Water Emission Estimates from Previous 2020 GHGI and 2021 GHGI

Table A-1. Data for 2018 from Previous 2020 GHGI and 2021 GHGI Emissions – Natural Gas

Year	2018 Emissions from 2020 GHGI (metric tons CH ₄)	2018 Emissions from 2021 GHGI (metric tons CH ₄)
1990	2,768	82,250
1991	3,722	87,876
1992	5,315	86,223
1993	6,195	85,646
1994	6,862	84,757
1995	7,729	83,456
1996	8,093	84,213
1997	10,156	87,333
1998	12,569	88,561
1999	19,300	92,330
2000	38,203	105,319
2001	51,504	120,606
2002	58,810	118,648
2003	58,970	125,401
2004	57,318	130,881
2005	59,884	139,453
2006	71,581	154,006
2007	73,169	162,558
2008	76,391	181,897
2009	66,048	187,284
2010	62,846	175,800
2011	59,822	174,296
2012	59,782	177,342
2013	60,047	178,105
2014	60,428	182,320
2015	60,745	171,523
2016	61,674	154,394
2017	61,674	157,488
2018	61,674	188,601
2019	Not Estimated	187,070

Table A-2. Data for 2018 from Previous 2020 GHGI and 2021 GHGI Emissions – Petroleum

Year	2018 Emissions from 2020 GHGI (metric tons CH₄)	2018 Emissions from 2021 GHGI (metric tons CH₄)
1990	Not Estimated	91,478
1991	Not Estimated	90,124
1992	Not Estimated	85,099
1993	Not Estimated	80,122
1994	Not Estimated	75,304
1995	Not Estimated	72,411
1996	Not Estimated	70,511
1997	Not Estimated	69,072
1998	Not Estimated	65,394
1999	Not Estimated	61,025
2000	Not Estimated	62,654
2001	Not Estimated	61,164
2002	Not Estimated	60,272
2003	Not Estimated	69,555
2004	Not Estimated	61,329
2005	Not Estimated	62,184
2006	Not Estimated	62,520
2007	Not Estimated	64,906
2008	Not Estimated	67,491
2009	Not Estimated	67,131
2010	Not Estimated	68,353
2011	Not Estimated	71,110
2012	Not Estimated	75,456
2013	Not Estimated	79,261
2014	Not Estimated	83,701
2015	Not Estimated	82,392
2016	Not Estimated	77,278
2017	Not Estimated	78,739
2018	Not Estimated	82,806
2019	Not Estimated	84,726