

MEMORANDUM –PROPOSED CHANGES TO SUBPART W INPUTS

To: Docket EPA-HQ-OAR-2011-0028

From: Lisa Bacanskas, EPA/Climate Change

Date: January 26, 2012

Subject: Proposed changes to Table A-7 in subpart A of 40 CFR part 98.

In this memorandum, we show the proposed changes to Table A-7 in subpart A of 40 CFR part 98 since amended by the Final Deferral (76 FR 53057, August 25, 2011). These changes to Table A-7 are proposed in the *Proposed Confidentiality Determinations and Corrections to the Petroleum and Natural Gas Systems Source Category, and Amendments to Table A-7, of the Greenhouse Gas Reporting Rule* (referred to hereinafter as the “Proposed Subpart W CBI Rule”). Table 1 shows the proposed deletions from Table A-7 with red strike-out text and shows the proposed additions to Table A-7 with red text in a green background.

Table 1. Proposed Changes to Table A-7 in subpart A of Part 98.^a

Subpart	Rule Citation (40 CFR part 98)	Specific Data Elements for Which Reporting Date is March 31, 2015 (“All” means all data elements in the cited paragraph are not required to be reported until March 31, 2015)
*	* * * * *	* *
W	98.236(c)(1)(i)	All.
W	98.236(c)(1)(ii)	All.
W	98.236(c)(1)(iii)	All.
W	98.236(c)(2)(i)	All.
W	98.236(c)(3)(i)	All.
W	98.236(c)(3)(ii)	All. Only Calculation Methodology 2.
W	98.236(c)(3)(iii)	All.
W	98.236(c)(3)(iv)	All.
W	98.236(c)(4)(i)(A)	All.
W	98.236(c)(4)(i)(B)	All.

Subpart	Rule Citation (40 CFR part 98)	Specific Data Elements for Which Reporting Date is March 31, 2015 ("All" means all data elements in the cited paragraph are not required to be reported until March 31, 2015)
W	98.236(c)(4)(i)(C)	All.
W	98.236(c)(4)(i)(D)	All.
W	98.236(c)(4)(i)(E)	All.
W	98.236(c)(4)(i)(F)	All.
W	98.236(c)(4)(i)(G)	All.
W	98.236(c)(4)(i)(H)	All.
W	98.236(c)(4)(ii)(A)	All.
W	98.236(c)(5)(i)(D)	All.
W	98.236(c)(5)(ii)(C)	All.
W	98.236(e)(5)(iii)	All.
W	98.236(e)(5)(iv)	All.
W	98.236(e)(5)(v)	All.
W	98.236(c)(6)(i)(B)	All.
W	98.236(c)(6)(i)(D)	All.
W	98.236(c)(6)(i)(E)	All.
W	98.236(c)(6)(i)(F)	All.
W	98.236(c)(6)(i)(G)	Only the amount of natural gas required.
W	98.236(c)(6)(i)(H)	Only the amount of natural gas required.
W	98.236(c)(6)(ii)(A)	All.
W	98.236(c)(6)(ii)(B)	All.
W	98.236(e)(7)(i)	All.
W	98.236(c)(7)(i)(A)	Only for Equation W-14A.
W	98.236(e)(8)(i)(B)	All.
W	98.236(e)(8)(i)(C)	All.
W	98.236(c)(8)(i)(F)	All.
W	98.236(c)(8)(i)(K)	All.
W	98.236(c)(8)(ii)(A)	All.
W	98.236(e)(8)(ii)(D)	All.
W	98.236(c)(8)(ii)(H)	All.
W	98.236(c)(8)(iii)(A)	All.
W	98.236(c)(8)(iii)(B)	All.
W	98.236(e)(8)(iii)(D)	All.

Subpart	Rule Citation (40 CFR part 98)	Specific Data Elements for Which Reporting Date is March 31, 2015 ("All" means all data elements in the cited paragraph are not required to be reported until March 31, 2015)
W	98.236(e)(8)(iii)(E)	All.
W	98.236(c)(8)(iii)(G)	All.
W	98.236(e)(10)(ii)	All.
W	98.236(e)(10)(iii)	All.
W	98.236(e)(11)(ii)	All.
W	98.236(c)(12)(ii)	All.
W	98.236(e)(12)(iii)	All.
W	98.236(c)(12)(v)	All.
W	98.236(e)(13)(i)(B)	All.
W	98.236(c)(13)(i)(E)	All.
W	98.236(c)(13)(i)(F)	All.
W	98.236(c)(13)(ii)(A)	All.
W	98.236(c)(13)(ii)(B)	All.
W	98.236(c)(13)(iii)(A)	All.
W	98.236(c)(13)(iii)(B)	All.
W	98.236(c)(13)(v)(A)	All.
W	98.236(c)(14)(i)(B)	All.
W	98.236(c)(14)(ii)(A)	All.
W	98.236(c)(14)(ii)(B)	All.
W	98.236(c)(14)(iii)(A)	All.
W	98.236(c)(14)(iii)(B)	All.
W	98.236(c)(14)(v)(A)	All.
W	98.236(e)(15)(i)(A)	All.
W	98.236(e)(15)(i)(B)	All.
W	98.236(c)(15)(ii)(A)	All.
W	98.236(c)(15)(ii)(B)	All.
W	98.236(e)(16)(i)	All.
W	98.236(e)(16)(ii)	All.
W	98.236(e)(16)(iii)	All.
W	98.236(e)(16)(iv)	All.
W	98.236(e)(16)(v)	All.
W	98.236(e)(16)(vi)	All.
W	98.236(e)(16)(vii)	All.

Subpart	Rule Citation (40 CFR part 98)	Specific Data Elements for Which Reporting Date is March 31, 2015 ("All" means all data elements in the cited paragraph are not required to be reported until March 31, 2015)
W	98.236(c)(16)(viii)	All.
W	98.236(c)(16)(ix)	All.
W	98.236(c)(16)(x)	All.
W	98.236(c)(16)(xi)	All.
W	98.236(c)(16)(xii)	All.
W	98.236(c)(16)(xiii)	All.
W	98.236(c)(16)(xiv)	All.
W	98.236(c)(16)(xv)	All.
W	98.236(c)(16)(xvi)	All.
W	98.236(c)(17)(ii)	All.
W	98.236(c)(17)(iii)	All.
W	98.236(c)(17)(iv)	All.
W	98.236(c)(18)(i)	All.
W	98.236(c)(18)(ii)	All.
W	98.236(c)(19)(iv)	All.
W	98.236(c)(19)(vii)	All.
*	* * * * *	* *

^a Notes about this table: These proposed deletions and additions to this table primarily result from changes to subpart W data elements as finalized in the [Final] *Mandatory Reporting of Greenhouse Gases: Technical Revisions to the Petroleum and Natural Gas Systems Category of the Greenhouse Gas Reporting* [Rule] (hereinafter referred to as the "Subpart W Technical Revisions final rule"; 76 FR 80554, December 23, 2011). Some of these changes are the result of new or removed data elements in the Subpart W Technical Revisions final rule; however, many other data elements were re-numerated in the Subpart W Technical Revisions final rule and accordingly correspond to an addition (red text in a green cell), deletion (red strike-out text), or combination of the two in the table above. The following changes to the above table correspond to the re-numerated data elements in the Subpart W Technical Revisions final rule:

- 40 CFR 98.236(c)(5)(iii) (strike-out deletion) was re-numerated to 98.236(c)(5)(ii)(C) (red text additions),
- 40 CFR 98.236(c)(5)(iv) (strike-out deletion) was re-numerated to 98.236(c)(5)(i)(D) (red text addition),
- 40 CFR 98.236(c)(16)(iii) (strike-out deletion) was re-numerated to 98.236(c)(16)(viii) and 98.236(c)(16)(iii) was replaced by a new non-input,
- 40 CFR 98.236(c)(16)(vii) (strike-out deletion) was re-numerated to 98.236(c)(16)(ix) and 98.236(c)(16)(vii) was replaced by a "reserved" placeholder,
- 40 CFR 98.236(c)(16)(xiii) was re-numerated to 98.236(c)(16)(xv) (red text addition) and 98.236(c)(16)(xiii) was replaced by another re-numerated input, and
- 40 CFR 98.236(c)(16)(xiv) was re-numerated to 98.236(c)(16)(xvi) (red text addition) and 98.236(c)(16)(xiv) was replaced by another re-numerated input.

As shown in Table 1, a number of rule citations are proposed to be removed from Table A-7 in subpart A of 40 CFR part 98 (see 76 FR 53057, August 25, 2012). Table 2 shows the justifications for proposing to remove these rule citations from Table A-7. As noted in the preamble to the Proposed Subpart W CBI Rule, these proposed deletions are either the result of changes to the underlying subpart W reporting requirements made by the Subpart W Technical Revisions final rule (e.g., data elements for which the citations were changed) or the result of the proposed re-assignment of data elements from the inputs data category to another data category in situations where the underlying data element(s) no longer meet the definition of inputs to emission equations provided in the July 7, 2010 CBI Proposal (see 75 FR 39094) (e.g., 40 CFR 98.236(c)(11)(ii) is proposed to be deleted from Table A-7 because the corresponding data element was revised in the Subpart W Technical Revisions final rule to be the *average* gas-to-oil ratio instead of the actual gas-to-oil ratios that are used as inputs to Equation W-18).

Table 2. Justification for moving data elements out of Table A-7 in subpart A of Part 98.^a

Rule Citation (40 CFR part 98)	Specific Data Element	Justification for Proposed Removal from Table A-7
98.236(c)(3)(ii)	Only Calculation Methodology 1.	Data element is not used as an input to Equation W-3 for Calculation Methodology 1 (only for Calculation Methodology 2).
98.236(c)(5)(iii)	All.	Re-numerated to 40 CFR 98.326(c)(5)(ii)(C) by the Subpart W Technical Revisions final rule. This data element is proposed to remain in Table A-7 under this new citation.
98.236(c)(5)(iv)	All.	Re-numerated to 40 CFR 98.326(c)(5)(i)(D) by the Subpart W Technical Revisions final rule. This data element is proposed to remain in Table A-7 under this new citation.
98.236(c)(5)(v)	All.	Re-numerated to 40 CFR 98.326(c)(5)(i)(E) by the Subpart W Technical Revisions final rule. This data element is proposed to move out of the input data category because the casing or tubing diameter are not used as inputs to Equation W-7.

Rule Citation (40 CFR part 98)	Specific Data Element	Justification for Proposed Removal from Table A-7
98.236(c)(7)(i)	All.	This data element and citation were removed by the Subpart W Technical Revisions final rule. This was replaced with a new data element (40 CFR 98.236(c)(7)(i)(A)) by the Subpart W Technical Revisions final rule and is proposed to be added to Table A-7.
98.236(c)(8)(i)(B)	All.	Data reporting element was slightly revised in the Subpart W Technical Revisions final rule and is not used as an input to any emission equations.
98.236(c)(8)(i)(C)	All.	Data reporting element was slightly revised in the Subpart W Technical Revisions final rule and is not used as an input to any emission equations.
98.236(c)(8)(ii)(D)	All.	Data reporting element was slightly revised in the Subpart W Technical Revisions final rule and is not used as an input to any emission equations.
98.236(c)(8)(iii)(D)	All.	Data reporting element was slightly revised in the Subpart W Technical Revisions final rule and is not an input to Equation W-15.
98.236(c)(8)(iii)(E)	All.	Data reporting element was slightly revised in the Subpart W Technical Revisions final rule and is not an input to Equation W-15.
98.236(c)(10)(ii)	All.	Data reporting element was slightly revised in the Subpart W Technical Revisions final rule. The data reporting element specifies the average gas-to-oil ratio for each basin while the specific gas-to-oil ratio for each well in a basin is specified in Equation W-17A.
98.236(c)(10)(iii)	All.	Data reporting element was slightly revised in the Subpart W Technical Revisions final rule. The data reporting element specifies the average number of days the well is tested in a basin which is not specified in Equation W-17B.
98.236(c)(11)(ii)	All.	Data reporting element was slightly revised in the Subpart W Technical Revisions final rule. The data reporting element specifies the average gas-to-oil ratio for each basin while the specific gas-to-oil ratio for each well in a basin is specified in Equation W-18.
98.236(c)(12)(iii)	All.	Data reporting element was revised in the Subpart W Technical Revisions final rule and is no longer an input to Equation W-18.

Rule Citation (40 CFR part 98)	Specific Data Element	Justification for Proposed Removal from Table A-7
98.236(c)(13)(i)(B)	All.	The fraction of operating time specified in Equation W-22 is not the same as the fraction of vent gas recovered specified in this data reporting requirement.
98.236(c)(15)(i)(A)	All.	The actual count of leaks as specified in this data reporting requirement is not an input to Equation W-30A or W-30B. The calculation is performed as the sum over all leaking equipment components.
98.236(c)(15)(i)(B)	All.	Data reporting element was revised in Subpart W Technical Revisions final rule to "range of concentrations" and Equation W-30 specifies actual concentration; thus, this is no longer an input to Equation W-30
98.236(c)(16)(i)	All.	Replaced in the Subpart W Technical Revisions final rule by a new data reporting requirement that is not an input to any emission equations.
98.236(c)(16)(ii)	All.	Replaced in the Subpart W Technical Revisions final rule by a new data reporting requirement that is not an input to any emission equations.
98.236(c)(16)(iii)	All.	Re-numerated to 40 CFR 98.236(c)(16)(viii) and replaced in the Subpart W Technical Revisions final rule by a new data reporting requirement that is not an input to emission equation. This data element is proposed to remain in Table A-7 under this new citation.
98.236(c)(16)(iv)	All.	Replaced in the Subpart W Technical Revisions final rule by a new data reporting requirement that is not an input to any emission equations.
98.236(c)(16)(v)	All.	Replaced in the Subpart W Technical Revisions final rule by a new data reporting requirement that is not an input to any emission equations.
98.236(c)(16)(vi)	All.	Replaced in the Subpart W Technical Revisions final rule by a new data reporting requirement that is not an input to any emission equations.
98.236(c)(16)(vii)	All.	Data element was re-numerated to 40 CFR 98.326(c)(16)(ix) by the Subpart W Technical Revisions final rule and replaced with a "Reserved" placeholder.

^a Notes about this table: This table includes four data elements that were re-numerated by the Subpart W Technical Revisions final rule (40 CFR 98.326(c)(5)(iii), (5)(iv), (16)(iii), and (16)(vii) that remain in Table A-7 under a different citation. The remaining 21 data elements, which include 20 rule citations (40 CFR 98.326(c)(8)(i)(B) was split into two data reporting elements for Calculation Methodologies 1 and 2), are proposed to be re-assigned to other data categories in the preamble to the Proposed Subpart W CBI Rule.