



EPA's Proposal to Reduce Climate- and Health-Harming Pollution from the Oil and Natural Gas Industry: Key Areas Where the Agency is Seeking Comment and Information

EPA is taking a significant step in fighting climate change and protecting public health through a proposed rule that would **sharply reduce methane and other harmful air pollution from both new and existing sources in the oil and natural gas industry**. EPA is seeking comments on the entire proposal. The Agency will accept written comment for 60 days after the proposal is published in the Federal Register and will hold a virtual public hearing. **EPA intends to issue a supplemental proposal in 2022** that will provide proposed regulatory text and may expand on or modify the 2021 proposal in response to public input. After taking public feedback into account, EPA intends to finalize requirements for new and existing oil and natural gas sources that are **strong, far-reaching and ambitious**, and that are **anchored in science and the law**. The Agency plans to issue a final rule before the end of 2022.

Below are **some key areas where EPA is requesting** comments **and information**. For instructions on submitting comments, see "How to Comment" in the fact sheets at <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry>.

Finding and repairing leaks (fugitive emissions)

- EPA is proposing a comprehensive monitoring program to require companies to find and fix leaks (known as "fugitive emissions") at new and existing well sites and compressor stations. The Agency is seeking comments on several aspects of the program EPA may consider in developing a supplemental proposal. Those include:
 - Additional information on advanced monitoring technologies that would assist EPA in determining whether the use of these technologies should be required at all well sites and/or compressor stations;
 - Ways to ensure fugitive emissions surveys identify malfunctions and large emissions sources that must be repaired;
 - Whether to adjust repair requirements based on the severity of emissions;
 - Whether the baseline emissions calculations that are used to determine whether well sites are required to undertake routine monitoring should account for periods when storage vessel controls do not operate as designed (a known cause of large emission events), and methodologies for doing so;

- Whether additional production and processing equipment and sources should be included in the site’s baseline emissions; and
- Alternative well site monitoring requirements that would meet Clean Air Act objectives while minimizing significant impact to small businesses, especially those with only a few employees, or small businesses that own very few wells.
- The Agency also is **seeking information on how it could empower communities** to help stem large emission events by detecting and reporting them to owners/operators for follow up and emission-reduction actions. EPA is requesting comment on technologies that may be used as part of such a community monitoring program, how large emissions events should be documented and reported to companies, and what follow-up actions would be appropriate.

Transitioning to Zero-Emitting Pneumatic Controllers

- EPA’s proposal would require all new and existing pneumatic controllers at production, processing, and transmission and storage facilities, to have zero methane and VOC emissions, with the exception of sites in Alaska that do not have power. The proposal also would regulate emissions from intermittent vent pneumatic controllers for the first time. The Agency is seeking comment on several aspects of the proposed requirements for pneumatic controllers, including:
 - Information on other potential control options that could demonstrate compliance with a standard of zero-emitting pneumatic controllers;
 - Information on specific functional needs that would require a low-bleed or intermittent controller

Eliminating Venting of Associated Gas from Oil Wells

- EPA’s proposal would eliminate venting of associated gas from oil wells and require owners and operators to route the gas to a sales line where available. Where a sales line is not available, owners and operators would have to **use the gas for power on site or another useful purpose, or route it to a flare or control device that reduces methane and VOCs by 95 percent.**
- The Agency is seeking comment on the overall format of the proposed requirements, along with:
 - The definition of an affected facility, and whether it should exclude wells that route all gas to a sales line.
 - How to define whether an oil well producing associated gas has access to a sales line and what factors should figure into that determination
 - Ways to provide incentives for owners and operators to capture or beneficially use associated gas instead of flaring it.

- Whether re-injecting associated gas from ongoing production into the well is a viable emissions control alternative

Strengthening Requirements for Storage Tanks

- EPA’s proposal would strengthen requirements for storage tanks by adding tank batteries (groups of tanks that are adjacent and receive fluids from the same source) to the definition of facilities that must reduce VOC and methane emissions. The Agency is seeking comment on the proposed definition and its implementation, including:
 - The number of new storage tanks or tank batteries that would be subject to the Agency’s New Source Performance Standards;
 - How often a storage tank in a tank battery is replaced with a bigger tank;
 - How the benefits of using flares to control emissions from storage tanks are affected by the need to burn fuel to for continuous pilot lights; and
 - EPA’s proposed definition of “legally and practicably enforceable” limits to ensure that tank batteries below the applicability threshold adequately control their potential to emit.

Broadening the Types of Pneumatic Pumps Covered by the Rule

- EPA’s proposal would extend current requirements for new pneumatic pumps to include all natural gas-driven diaphragm and piston pumps in the production segment of the industry, and diaphragm pumps in the transmission and storage segment. The Agency is seeking comment on:
 - Whether, and to what extent, natural gas-driven pneumatic pumps are used in the natural gas transmission and storage segment of the oil and natural gas industry;
 - Whether it is technically feasible to require the use of zero-emitting pneumatic pumps at new and existing facilities with access to electric power or solar power; and

Evaluating Additional Sources of Pollution

- EPA is requesting comments and information to help the Agency evaluate opportunities to obtain additional pollution reductions, including from certain sources not covered by the proposal. Those include:
 - Abandoned and unplugged wells, which the public and stakeholder groups identified as pollution sources of concern during pre-proposal outreach;
 - Opportunities to improve performance and minimize malfunctions at flares;
 - Pipeline “pigging” operations; and
 - Tank truck loading operations.

Establishing Existing Source Standards in State Plans

- EPA is seeking comment on several aspects of the proposal related to state plans under the proposed Emissions Guidelines. Those include:
 - Ways existing state programs can be adopted into state plans under the Emissions Guidelines;
 - How state plans that regulate both sources covered by the proposed Emissions Guidelines – and sources that are not covered by the proposed guidelines – could be tailored to meet requirements of the proposed Emission Guidelines;
 - Whether EPA should allow states to include a different form of numerical standard for existing sources, as long as they can demonstrate they are as stringent as the final Emissions Guidelines; and
 - Factors that could affect how states consider remaining useful life and other factors when applying standards to existing sources in state plans

For More Information

- To read the proposed rule, additional fact sheets, and for instructions on submitting comments, visit: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry>