

A photograph of an oil field at night. Several pumpjacks are illuminated by bright yellow lights against a dark blue twilight sky. In the foreground, a large metal structure, possibly a wellhead or part of a drilling rig, is also lit up. The ground appears to be covered in snow or ice.

EPA'S INFORMATION COLLECTION REQUEST

WHAT IS THE 2ND DRAFT ICR?

On September 22, 2016, the Environmental Protection Agency (EPA) issued a second draft of the Information Collection Request (ICR) intended for onshore oil and natural gas companies. This second draft includes changes made by EPA in response to comments.

Following a short comment period, EPA intends to finalize and issue the ICR as discussed below. The purpose of this ICR is to collect information needed to develop new regulations to reduce methane emissions from the onshore oil and natural gas industry.

WHY DOES THE EPA NEED MORE INFORMATION?

The EPA asserts that the oil and gas industry as a whole is the largest industrial emitter of methane in the U.S. As a result, EPA has taken steps to address this and fulfill the Obama

Administration's climate action plan to reduce methane emissions. These steps include issuing New Source Performance Standards (NSPS) that target reducing methane and smog-forming volatile organic compounds (VOC) emissions under 40 CFR part 60 subpart OOOOa. [Click here](#) for more information about OOOOa.

However, these standards only apply to new, modified, and reconstructed sources in the oil and natural gas industry.

The proposed ICR would be directed towards using Section 111(d) of the Clean Air Act (CAA) to create performance standards that apply to not only new, modified, and reconstructed sources, but also to existing oil and gas emission sources. EPA is pursuing this avenue after reviewing a wide range of data from EPA's [Greenhouse Gas Reporting Program](#) (GHGRP), government studies, industry industry research and more. As a result of this

review, EPA has determined that existing methane emissions sources (which are not currently covered by the NSPS) are higher than anticipated.

WHAT DATA/INFORMATION IS THE EPA SEEKING?

The second draft ICR consists of two parts, the Operator Survey and a Detailed Facility Survey. Part 1, the Operator Survey, can be thought of as an equipment survey. The Operator Survey seeks company specific information to better understand the types and numbers of equipment used on-site. Part 1 is expected to be sent to 15,000 operators of oil and gas production wells, and requires certification by owner or operator that the data is accurate and complete. It may be submitted electronically or by hard copy.

Part 2, the Detailed Facility Survey, will request more unit specific information and data pertaining to emission controls. It will also request gas venting data, including blowdown activities, maintenance work, and tank flashing. Part 2 is not limited to well production facilities. It will be sent to 3,818 selected oil and gas facilities including production, gas gathering and boosting, processing, etc. EPA expects facilities will have the majority of the information requested readily available; however, equipment surveys will be needed to collect a portion of the information (ex. number of pneumatic devices). Part 2 must be submitted electronically (via the EPA's [Electronic Greenhouse Gas Reporting Tool](#)).

EPA states that the ICR is not designed to duplicate

data already reported via federal programs like the Greenhouse Gas Reporting Program. Facilities selected to complete Part 2 are not required to complete the equipment count portion of Part

1. Facilities selected to complete only Part 1 must include equipment counts.

WHAT CHANGES HAVE BEEN MADE FOLLOWING THE FIRST DRAFT?

This second draft takes into account issues brought up in comments following the first draft. Clarification was added to how owners/operators should report well site information and centralized production areas those wells feed. Questions regarding the number of manned/unmanned facilities and sites' access to electricity were moved from Part 1 to Part 2. The EPA also clarified that for Part 2, they will only request detailed information for randomly selected wells and centralized production sites the wells feed, not every well in the industry.

EPA has modified the number of recipients for Part 1 and 2 for the second draft. They now expect Part 1 to be sent to 15,000 owners/operators, 7,500 less than anticipated in the first draft. In addition, EPA increased the number of Part 2 recipients increased from 3,385 to 3,818.

WHO WILL BE CHOSEN TO COMPLETE PART 2 ICR?

The EPA has provided some guidance regarding how facilities will be selected for the Part 2 ICR, but they have not issued a Part 2 mailing list at this time.

EPA's goal is to use categories to separate facilities and then choose a statistically significant number of facilities within each category, based on the current population of facilities. For categories, the EPA will use gas oil ratio (GOR) ranges, anticipating that using GORs will separate well sites by their primary product, which should provide more information about the equipment on-site. The EPA desires to collect information from both low-production wells (15 barrels of oil per day) and higher production wells in each category. EPA also seeks information on underground storage facilities.

EPA contractor RTI International has recently published a means to update contact information that EPA will use to transmit the ICR to oil and gas operators. Although RTI indicates that updates were due to these lists by October 31, 2016, Trihydro recommends that any operators that have not verified their contact information do so as soon as possible, and provide updates as needed. Otherwise the ICR could be sent to incorrect facilities, delaying your ability to respond within the required timeframes. Please go to <https://oilandgasicr.rti.org/> for further information.

WHEN?

Once the second draft ICR is finalized, EPA will issue Clean Air Act Section 114 letters requiring facility owners/operators to complete the one-time ICR. EPA has pushed back the issue date, which is expected before the end of 2016. Industry is legally required to respond within the given deadlines. The Part 1 Operational Survey must

be completed within 30 days of receipt, and the Part 2 Detailed Facility Survey must be completed within 120 days of receipt.

FURTHER INFORMATION

If you would like further information pertaining to this draft ICR, or have any other air related regulatory needs, please contact Jay Christopher or Calvin Niss with Trihydro at 800-359-0251.

- To view the 2nd Draft ICR and survey questions for Part 1 and Part 2, visit <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/oil-and-gas-industry-information-requests>
- For New Source Performance Standards information pertaining to new, modified and reconstructed sources, visit <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry>



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