

Environmental Meeting

Expo & Conference

Galveston, Texas

April 01, 2022

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EXPERTISE**

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NSPS 0000 & Beyond Update

- Walk through Summary Document
- Q & A
- Next Steps

New Mexico Brief Update

- Summary
- Potential Timing

House Keeping

- Guidance Document PDF Files on Website
- Other Rules or Stakeholder Engagement
- Newsletters
- In Person Technical Meetings

Guest Speaker

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Applicability Table

TABLE 1—APPLICABILITY DATES FOR PROPOSED SUBPARTS ADDRESSED IN THIS PROPOSED ACTION

Subpart	Source type	Applicable dates
40 CFR part 60, subpart OOOO	New, modified, or reconstructed sources	After August 23, 2011 and on or before September 18, 2015.
40 CFR part 60, subpart OOOOa	New, modified, or reconstructed sources	After September 18, 2015 and on or before November 15, 2021.
40 CFR part 60, subpart OOOOb	New, modified, or reconstructed sources	After November 15, 2021.
40 CFR part 60, subpart OOOOc	Existing sources	On or before November 15, 2021.

TIMELINE REFERENCE

NSPS 0000

NSPS 0000a

2020 Technical Papers for NSPS 0000a

NSPS 0000a amendment, NSPS 0000b, & NSPS 0000c

NSPS 0000a

WELL SITES – DEFINITION MADE CLEAR

The EPA is proposing to exclude from fugitive emissions monitoring a well site that is or later becomes a “wellhead only well site,” which the 2020 Technical Rule defines as “a well site that contains one or more wellheads and no major production and processing equipment.”

As explained in that rulemaking, “[s]ome well sites, especially in areas with very dry gas or where centralized gathering facilities are used, consist only of one or more wellheads, or ‘Christmas trees,’ and have no ancillary equipment such as storage vessels, closed vent systems, control devices, compressors, separators and pneumatic controllers. Because the magnitude of fugitive emissions depends on how many of each type of component (e.g., valves, connectors, and pumps) are present, fugitive emissions from these well sites are extremely low.” 80 FR 56611.

The 2020 Technical Rule defined “major production and processing equipment” as including *reciprocating or centrifugal compressors*, glycol dehydrators, heater/treaters, separators, and storage vessels collecting crude oil, condensate, intermediate hydrocarbon liquids, or produced water.

For the reason stated above, the EPA is proposing to amend the 2016 NSPS 0000a to allow monitoring of methane fugitive emissions to stop when a wellsite contains only wellhead(s) and no major production and processing equipment, as provided in the 2020 Technical Rule.

NSPS 0000b

- OGI monitoring
- Zero bleed pneumatics
- OGI emissions controller repair
- 95 % control device option for pneumatic pump emissions at production and natural gas processing facilities
- Monitor the rod packing emissions annually using a flow measurement, when the measured leak rate exceeds 2 scfm (in pressurized mode), replacement of the rod packing would be required.
- Serial Number and DOM tracking

The Hearing Officer's Report was filed with the EIB on February 24, 2022

From that filing the board has 60 days or until April 25, to "reach its decision."

The EIB commenced its deliberations on March 10-11 and will conclude its deliberation on April 11-15, 2022.

The conclusion of deliberations by April 15 likely will satisfy EIB's April 25 deadline to "reach its decision."

After deliberations, EIB's counsel will present an order setting forth the new rule and statement of reasons.

More than likely, EIB will allow counsel to present it with the order in mid-May.

The EIB will "adopt" the new rule by approving the order presented by its counsel, probably not later than mid-June.

Within 15 days after EIB "adopts" the rule, EIB files it with the State Records Administrator.

Around the end of June or in early July, the State Records Administrator will publish the rule in the NM Register.

Under 1.24.25.15.B NMAC, unless EIB specifies a different date, the rule's effective date is the date of that publication.

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Join us for a compelling, full-day agenda and expert speakers at the Hart Energy *2022 Carbon Management Conference* on May 16 in Fort Worth, Texas.

Questions?

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