Important Recent Federal Actions and State Air Permit Issues that Will Affect Oil and Gas Producers

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Texas Commission on Environmental Quality
Topics for Discussion

- ePermits
- Updates to NSPS
- Draft CTG for the Oil and Natural Gas Industry
- Aggregation of Oil and Gas Sites
Administrative Documents

- Cover Letter
- Core Data Form
- PI-7; PI-7CERT; APD-CERT
- Copy of check or ePay voucher
What can I register with it?

- All PBRs
- Oil and Gas Standard Permits

Am I required to use it?
All 75 PBRs that don’t require registration will have a same-day response.
• Same-day response (if specific parameters);
• Company will receive authorization letter; and
• Staff will periodically review these submittals manually.
Methane and VOC Standards

- Proposal to amend NSPS OOOO and OOOOa by setting standards for methane and VOC
- Proposal published in Federal Register on September 18, 2015
Sources Affected

- Compressors (centrifugal and reciprocating)
- Pneumatic controllers and pumps
- Hydraulically fractured wells (well completions)
- Well site and compressor station fugitives
- Natural gas processing plant equipment leaks
Pneumatic Pumps

- New, modified, and reconstructed natural gas-driven and diaphragm pumps
- Requires emission control by 95% in all source categories except natural gas processing plants
- For natural gas processing plants, emissions of methane and VOC must be zero
Hydraulically Fractured Wells

Non-exploratory & non-delineation wells
- Reduced emissions completions aka green completion
- Combustion device

Exploratory & delineation wells
- Combustion device
Fugitive Emissions Monitoring

- Defines fugitive emission components
- Requires use of optical gas imaging
- Sets leak monitoring schedule:
  - Includes incentives for minimizing leaks
  - Includes requirements for repairing leaks and resurveying
Electronic Reporting

- Requires electronic submittal of reports (CEDRI)
- May require reporting quantitative environmental results on corporate websites
TCEQ Comments on NSPS OOOOa

- Impact on Regulatory Agency
  - Workload
- Independent third party verification
- Electronic reporting
TCEQ Comments on NSPS OOOOa

- Impact on Industry
  - Number of active wells
  - Cost of implementation
  - Proposed timelines
TCEQ Comments on NSPS OOOOa

- Leak Detection and Repair Program (LDAR)
  - Use of Optical Gas Imaging
  - Existing LDAR programs
- Repair time for leaking components
- Sonic Flares and Control Technology
Control Techniques Guidelines

• Draft published in Federal Register on September 18, 2015

• Recommendations for evaluation of VOC RACT for existing sources in ozone nonattainment areas classified as moderate or above
Sources Affected by Control Changes

- Storage vessels
- Equipment leaks from natural gas processing plants
- Compressors and pneumatics
- Fugitive emissions
TCEQ Comments on Draft CTG

- Draft CTG Use
- Due Date for SIP revisions
- Model Rule Language
- Pneumatic Controllers and Pumps/ closed vent systems and equipment leaks
- Fugitive Emissions from Well Sites and Compressor Stations
## Source Determination

<table>
<thead>
<tr>
<th>EPA Proposal</th>
<th>Texas Statute</th>
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<tbody>
<tr>
<td>• Option 1 - within (\frac{1}{4}) mile</td>
<td>• Within (\frac{1}{4}) mile and operationally dependent</td>
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<tr>
<td>• Option 2 - within (\frac{1}{4}) mile or greater than (\frac{1}{4}) mile with functional interrelatedness</td>
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TCEQ Comments on Source Determination

- General Comments on finalization of either option
- Probable increase in number of major source permitting
- Permitting Timeframes
- Daisy Chaining
Contact Information

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