



# **NEW SOURCE PERFORMANCE STANDARD**

40 CFR 60, Subpart OOOOa

### Issue

- Marginal Wells (<15 bpd oil or <90 MCF/d gas) subject to costly leak detection and repair requirements (LDAR)
- **EPA** decisions based on very limited study data

## Response

Objective, transparent, repeatable, and reliable emissions measurements from marginal vs. non-marginal well sites

### Federal Methane Regulations

# **EPA Deletes Marginal Well Exemption**

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refrected in some of the anegations.

However, Reeves suggests, common sense does not always trump actual data. "I think EPA is looking for quantitative data and has put the onus back on the industry, basically saying, 'If you really think these sites are not a source of emissions, gather some data and make your case," she characterizes. "As silly as it sounds, EPA's theme seems to be 'show us the money.' Unfortunately, these days, no one in the industry has much money."

KEY **OBJECTIVE:**  Support common sense regulation based on defensible data.

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# **KEY DATA GAPS** What we don't know

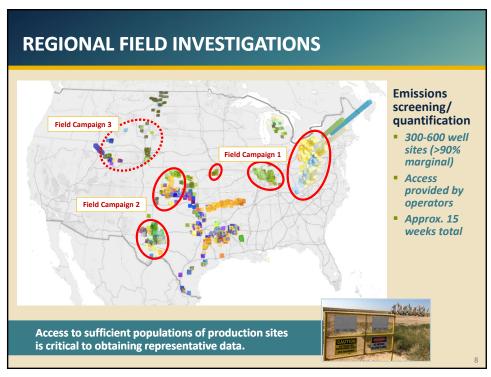
- Diversity and range of physical and operational characteristics of distinctive production site populations
  - Activity data (e.g. major equipment counts)
  - Frequency, timing, and duration of high-emission events
- Distribution of methane emissions from low-production sites

Site-level activity data and emissions measurements are needed to better characterize methane emissions from low-production sites.

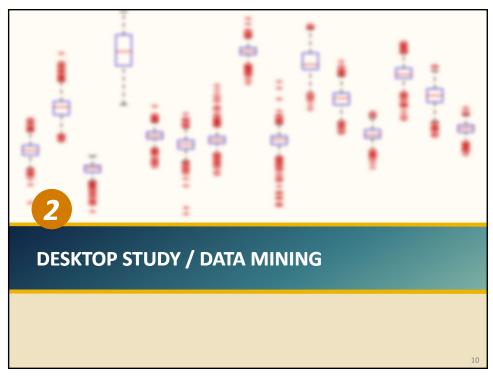


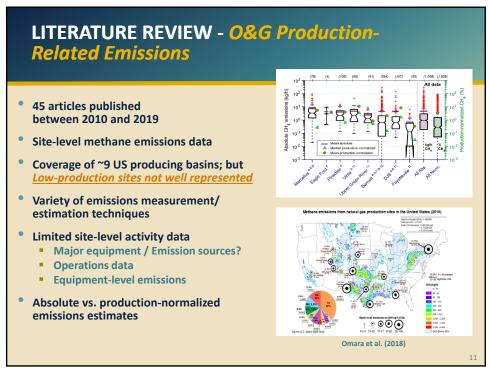
# **OVERALL STUDY APPROACH** Emissions Detection/Screening Desktop Study / Data Mining Literature and operator surveys Database compilation / statistical analysis Field Investigations Statistically-based sampling design Multiple production basins/regions **Emissions** Measurement Established measurement protocols Messaging and Communication Engagement with industry, state regulators, EPA, etc. Project Reporting

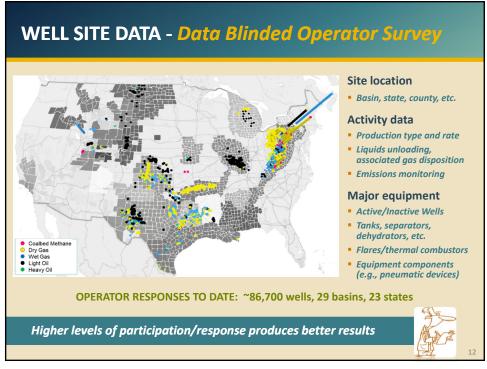
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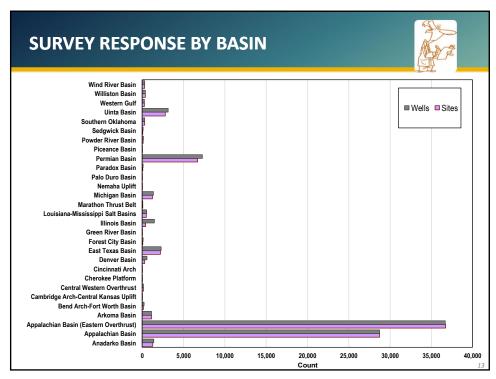


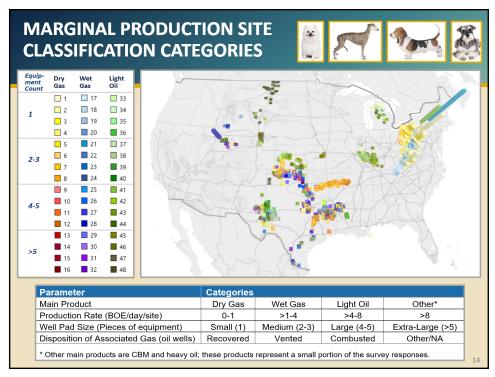


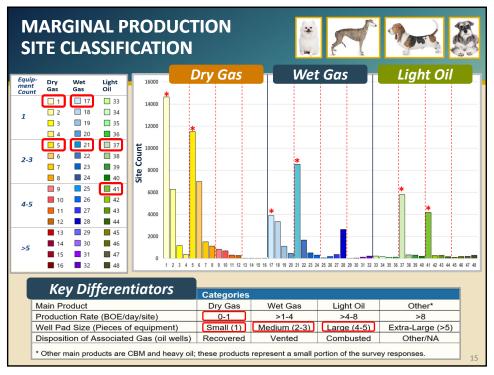


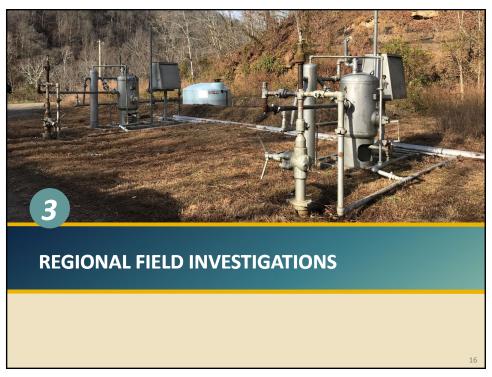


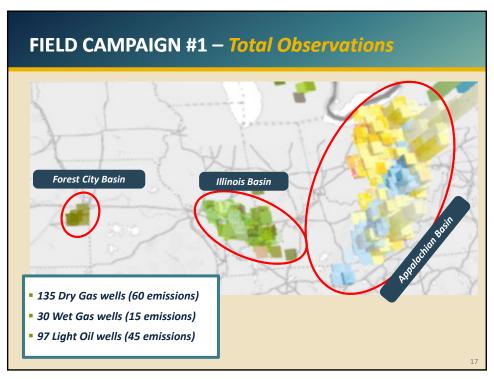


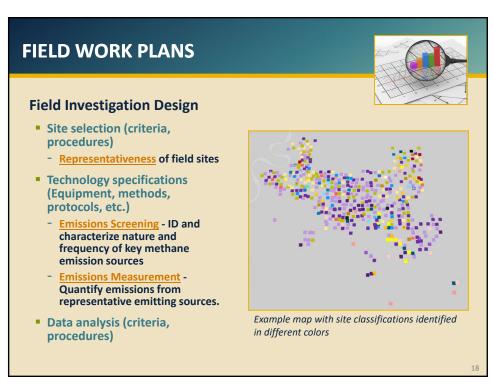


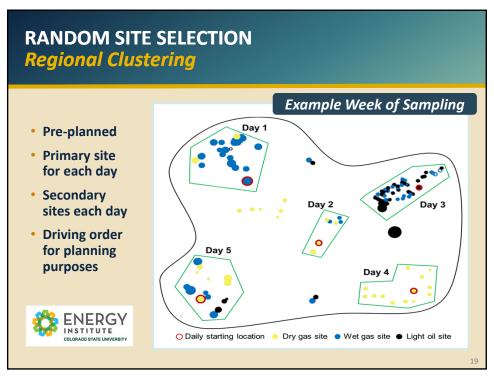














# FIELD DATA COLLECTION "Activity Data" Weather data Major equipment counts Operator "Interview" Production type and rates Liquids unloading details Disposition of associated gas Emissions monitoring Operating conditions typical/variable? Component counts (time permitting) Site-level activity data to characterize the significance and representativeness of conditions observed, and not observed, at the time of each site visit.

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