

# Unaddressed Uncertainties When Scaling Regional Aircraft Emissions Surveys to Basin Emission Estimates

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## Abstract

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Wide-area aerial methods provide comprehensive screening of methane emissions from oil and gas (O&G) facilities in production basins. Emissions detections ('plumes') from these studies are also frequently scaled to basin level. However, little information exists to determine if plumes detected fugitive emissions or known, reported, maintenance activities. This study analyzed an aircraft field study in the Denver-Julesberg basin to quantify how often plumes identified maintenance events, using a geospatial inventory of 12,629 O&G facilities with facility outlines. Study partners (7 midstream and production operators) provided timing and location of 5910 maintenance events that occurred in a 6-week period. Results indicated three substantial uncertainties with potential bias unaddressed by current prior studies. First, plumes often detect maintenance events, which short-duration, large, and poorly estimated by aircraft methods:

14 9.2% to 48% [35% to 62%] of plumes on production were likely due to known main-  
tenance events. Second, data indicated that plumes on midstream facilities were both  
16 infrequent and unpredictable, calling into question whether these estimates were repre-  
sentative of midstream emissions. Finally, 4 plumes attributed to O&G, representing  
18 19% of all emissions, were not aligned with any location that would logically create  
emissions. While it is unclear how frequently this occurs, in this study it had mate-  
20 rial impact on emissions estimates and was detectable only with complete geospatial  
information. While aircraft emissions detection remains a powerful tool for identifying  
22 methane emissions on oil and gas facilities, this study indicates that additional data  
inputs, such as detailed GIS data, a more nuanced analysis of emission persistence  
24 and frequency, and improved sampling strategies are required to accurately scale plume  
estimates to basin emissions.

## 26 Introduction

Methane is the second most common greenhouse gas (GHG), increasing interest in the quan-  
28 tification and mitigation of anthropogenic methane emissions. Additionally, as a short-lived  
atmospheric species with a global warming potential (GWP) 86 times that of CO<sub>2</sub> over a  
30 20-year time horizon, control of methane emissions could produce a substantial reduction in  
climate forcing.<sup>1,2</sup> In the U.S., methane emissions from the oil and gas (O&G) supply chain  
32 accounts for approximately one third of anthropogenic methane emissions,<sup>3</sup> with the natural  
gas production, transport, use and export accounting for the majority of those emissions.  
34 Recent legislative initiatives,<sup>4,5</sup> and subsequent regulatory moves, have increased interest in  
accurate assessment of O&G methane emissions. Additionally, O&G operators have publicly  
36 committed to report and reduce methane as part of voluntary programs for measurement<sup>6</sup>  
and reporting standards.<sup>7-9</sup>

38 The natural gas supply chain is traditionally divided into several sectors, including ex-  
ploration and production, gas processing, distribution, and ‘midstream’ transport operations

40 including gathering and boosting (G&B), transmission and storage (T&S), and liquified nat-  
42 ural gas (LNG). While the supply chain is trans-national, production through midstream  
sectors occur in every production basin.

In all sectors, methane emissions are classified into three categories. *Fugitive* emissions re-  
44 fer to unplanned emissions, typically from leaks, abnormal process conditions, or degradation  
of operational components. *Vented* emissions refer to the planned release of uncombusted  
46 gas from maintenance operations (e.g. depressurization of equipment (blowdowns), well liq-  
uid unloadings, etc.) or the non-combustion use of pressurized gas in process control (e.g.  
48 gas-driven pneumatic controllers and pumps). *Combustion* emissions, or ‘combustion slip,’  
refers to unburned fuel gas in the exhaust from combustion processes, such as gas-fueled  
50 engines or turbines, heaters, flares, and thermal oxidizers.

Fugitive emissions, including excess emissions from poorly operating vented or combus-  
52 tion sources, are (by definition) unknown and must be detected before they can be quantified,  
reported, and mitigated. In contrast, properly operating vented and combustion sources are  
54 generally known to operators, and are typically estimated and reported to regulatory or  
voluntary programs. Most maintenance events are short, episodic, emission sources. Opera-  
56 tors typically log the time and nature of the event and estimate emissions for reporting via  
a variety of engineering methods.<sup>10</sup> A typical production operation in one basin may have  
58 hundreds of events per workweek.

Methane emissions have traditionally been assessed using on-site emissions measure-  
60 ments,<sup>11-16</sup> occasionally coupled with simultaneous, full-facility estimates using downwind  
methods.<sup>17-21</sup> A key aspect of these on-site studies was the presence of on-site staff who  
62 could observe and log the operational state of the facility during measurement. Maintenance  
events that occurred during measurement were typically logged, and measurements were  
64 adjusted for the maintenance activity or treated separately in data sets. As a result, on-site  
studies generally control for emissions from maintenance activities.

66 More recently, anonymous top-down (TD) sampling of facility-scale emissions has be-

come more common. These methods have been exceptionally useful for rapidly estimating  
68 emissions from large numbers of facilities in short periods, and identifying patterns in the  
frequency and magnitude of large emitters. With the exception of a 2016 study,<sup>22</sup> most of  
70 these studies utilize facility-scale aerial methods<sup>23–28</sup> or, less commonly, anonymous deploy-  
ment of downwind methods<sup>29,30</sup> without observers on the facility. Studies of this design lack  
72 coordinated on-site observations, making it difficult to differentiate maintenance venting or  
combustion slip emissions, which are typically known and reported, from fugitive emissions,  
74 which are reported only if independently discovered (*Reported* values vary in accuracy and  
may not always reflect actual emissions). Recent campaigns have attempted to account  
76 for maintenance emissions by estimating emitter persistence.<sup>24</sup> However, questions remain,  
namely: What fraction of emitters discovered by anonymous, TD surveys are due to known  
78 maintenance events?

The data used here was collected as part of the *Colorado Coordinated Campaign (C3)*.<sup>31</sup>  
80 Field work was conducted in July and September 2021 in the Denver-Julesberg (DJ) basin  
in northeastern Colorado. The boundary of the study is shown in Figure S-1. C3 included  
82 aerial sampling coordinated with on-site measurement and extensive operational data collec-  
tion. During the measurement period, partner operators were asked to record and report all  
84 maintenance events to the study team. The first stage of reporting was done double-blind:  
Measurement teams did not know what events were reported, and operators did not know  
86 where aerial or ground teams identified emitters (SI section S-2). A second stage allowed  
operators to assess the timing of detected emissions to identify potential explanations for  
88 the emissions. This second stage resulted in identification of additional known maintenance  
and pre-production events.

90 The coordinated sampling in this study provides the first controlled, in-depth, analysis  
of how often an anonymous aerial sampling method detects known emissions. Additionally,  
92 the event dataset profiles when, where, and what type of venting occurs during maintenance,  
providing unique insight into weekly and diurnal patterns.

## 94 **Methods**

Data utilized for this analysis includes three data sources. First, aerial screening anonymously sampled a defined subset of the DJ basin (hereafter the ‘study area’). Each detection (a ‘plume’) was also quantified by the aerial team and assigned a location category - agriculture (‘Ag’), waste management (‘Waste’) and O&G. Second, partner production and midstream operators in the basin provided lists of maintenance events including location (latitude and longitude), type of event, and when the event occurred. Finally, a variety of public data sources were integrated to identify the location and operator(s) of O&G facilities in the study area. Each data source is discussed in the following subsections.

### **Aerial Sampling**

104 Aerial sampling was conducted by a team from the University of Arizona and Carbonmapper, and all data collected during the aerial campaign was later released on the Carbonmapper data portal.<sup>32</sup> Initial work utilized data provided directly by Carbonmapper shortly after the flights. These data were updated in July 2023 from the Carbonmapper data portal.

108 Flights covered a subset of the more active portion of the DJ basin (Figure S-1). Flights covered approximately half of the study area each flight day; most areas were revisited approximately every second flight day. Figure 1 provides an example of two such consecutive flights in September 2021; animations in the SI illustrate all flights overlaid with maintenance events. Each flight leg overlapped the previous leg, providing full coverage of the overflown area (Figure S-2). Due to the overlap, some facilities were overflown twice on one day within 114 15-20 minutes.

With crew rest and weather restrictions, aircraft flight operations occurred on 18 days during the four weeks planned for coordinated sampling. The duration of flights ranged from 0.94 to 5.1 hours, for a total of 76 hours during the field campaign. Since the aircraft cannot observe emissions during turns and other maneuvers, flight coverage was divided into 118

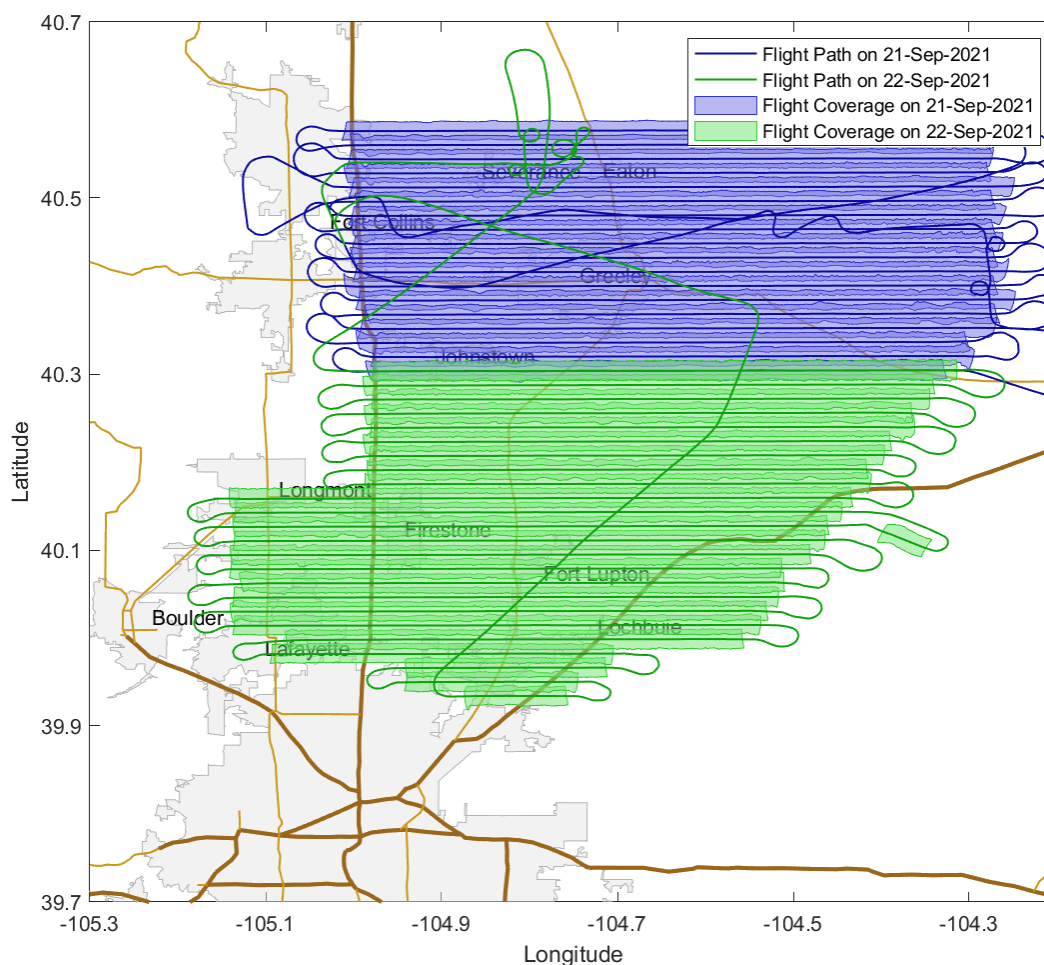


Figure 1: Example showing two consecutive flight days. Flights were structured to allow approximately half of the study area to be covered on each flight day. Lines represent path followed by the aircraft, taken from FlightRadar24.com. Shaded areas represent land area covered by the imaging system; effective sampling does not occur while the aircraft is turning at the end of each flight leg. While exact flight coverage varies by day, shaded area is approximates the study boundary on all days (see Figure S-1);

355 segments where observations met quality control requirements, resulting 49.8 hours of  
 120 aircraft observation time. Flight coverage segments ranged from 0.46 to 13 minutes in length.

Flight start times varied from 09:12:17 to 13:50:00, and finished in the early afternoon.

122 Observation times occurred on both weekdays (33.5 hours), and weekends (16.3 hours). The  
resulting fraction of weekday time – 67% – is representative of the ratio of weekdays to total  
124 days.

Various sources provide different estimates of the detection sensitivity for the Carbon-  
126 mapper method, ranging from a popularly quoted ‘10-20 kg/h’ to 32 kg/h in a 3 m/s wind  
by Conrad et al.<sup>33</sup> to a ‘full detection limit’ of 280 kg/h by Kunkel et al.<sup>34</sup>. In this study,  
128 the mean estimated plume emission rate was 283 kg/h, with 95% of all estimates above 30  
kg/h.

## 130 **Event Data**

The study was assisted by 7 companies (‘partner operators’) with major operations in the  
132 DJ basin. For all but one partner, the study was double-blind: The operators did not know  
where the aircraft had detected plumes, and the aircraft team did not know where events  
134 had been reported. These partners also supported onsite measurements of emissions by the  
ground teams (not covered in this paper). The remaining operator was engaged in merger  
136 activities during the field campaign, but provided event data approximately 6 months after  
the last field period, prior to being informed of any aerial results (SI Section S-2).

138 Maintenance event data was not available for non-partner facilities. Fortunately, partners  
operate a majority of the facilities in the study area: Of the approximately 89 operators in  
140 the study area, partner operators collectively operate 69% of midstream facilities and 85% of  
production facilities, which produce 93% of the natural gas in the basin.

142 Partners provided maintenance event data for two periods, July 1 through July 31,  
2021 and September 19 through October 1, 2021. Except for three long-duration pipeline  
144 leaks, the 5031 reported maintenance events represent episodic venting – i.e. short-duration,  
vented, emissions. Events provided to the study team were later aggregated by the operators  
146 and included in regulatory reporting. Partners reported events from their internal tracking  
systems, which varied between partners in both classification of events and which events

148 were recorded. To provide consistent treatment, the study team worked with the partners to  
classify events into 10 categories, some with sub-categories: Blowdown, Bradenhead, Com-  
150 pression, Hot Oiling Flowline, Pigging, Pipeline Leak, Swab, Tank, Unloading and Well.  
See SI Section S-2 for more complete descriptions. While many logged and reported events  
152 likely produced peak emission rates below the method detection limit (MDL) of the aircraft  
method,<sup>34</sup> all events were considered as potential matches to aircraft plumes.

154 Clustering events to those falling within 20 m of each other, 89% of locations (1680 of  
1893 locations) had only one type of episodic event, but up to 5 event types occurred at a  
156 few locations.

While partners provided latitude and longitude where each event occurred, the location  
158 where emissions are released to the atmosphere may differ by 10s of meters from the reported  
maintenance event location. For example, a well unloading may be reported by the wellhead  
160 location, while the venting of gas may occur at tanks on the wellpad. It was therefore  
important that all facilities had geospatial outlines, particularly for large well pads and  
162 midstream facilities. Events and plumes were both matched to facilities; any plume on a  
facility matches any event on the same facility if overflight and event timing aligned.

164 For this analysis, the primary question is whether the aircraft was overhead when the  
event was occurring. Event timing was reported with varying specificity, depending upon  
166 what operator personnel had logged, resulting in three classifications:

1. Events identified only by the day of the event (2,639 events, 43%).
- 168 2. Events with specified start time, but no end time (744 events, 12%).
3. Events with both start and end times (2,692 events, 44%).

170 To simulate the probability that an aircraft *may* see an event, it is necessary to estimate  
(a) when the event started, (b) the duration of the event, and (c) when emissions occurred  
172 during the event. Monte Carlo (MC) simulation methods were utilized to deal with this  
uncertainty.



174 *Start times:* If only a date was provided (classification 1, above), start time was simulated  
by drawing a start times from events of the same category – i.e. events in classifications 2  
176 and 3, above.

*Durations:* When an end time was not provided (classifications 1 and 2, above), duration  
178 was simulated by drawing the duration from events of the same category (i.e. events in  
classification 3).

180 Additionally, since most events were logged by personnel, recorded timing may have  
errors. Therefore, MC detection simulations included a time buffer before (5 minutes) and  
182 after (15 minutes) the emission period to account for uncertainty in operator logs, clock  
errors and dispersion time of the emission plume.

184 *Active emission periods:* Reported event durations reflect the entire duration of a main-  
tenance operation, and are not necessarily indicative of the duration of emissions. Active  
186 emission periods were simulated as described in SI Section S-4. These simulations were used  
in all cases to estimate the practical duration of an event. In a few cases (e.g. Table S-7),  
188 the probability of detecting *within* the duration of the event was also simulated.

## Facility Data

190 A step-by-step discussion of the facility list development is provided in SI Section S-3 and  
Table S-5; a brief description follows.

192 The primary data source for facility location and facility metadata were facilities re-  
ported to the Colorado Department of Public Health and Environment (CDPHE) greenhouse  
194 gas reporting program<sup>35</sup> for reporting year 2021. These data were submitted to the state  
by June 30, 2022, with updates occurring into late 2022. A final facility list was compiled  
196 cooperatively by CDPHE and the study team in May 2023. The GHG data included facility  
locations (longitude and latitude), operator identifier, and basic information about facilities.  
198 For production, reports connected wellheads identified by API number (a unique identifi-  
cation code assigned to all well bores in the U.S.) to wellpads identified by state reporting

200 numbers (AIRS\_ID).<sup>36</sup> Data from CDPHE GHG reports provided metadata for 4,679 fa-  
cilities (37% of facilities). These data were augmented by additional public midstream data  
202 (SI Section S-3).

Wellhead locations and production rates for 2021 were acquired from Colorado Energy  
204 and Carbon Management Commission (ECMC) data portal<sup>37</sup> in January 2022. Well locations  
were clustered by distance, resulting in wellhead clusters ranging from 1-24 wellheads (Figure  
206 S-6). The wellpad and wellhead cluster facility types represent a wide range of complexity,  
from a single wellhead far from any other facility, to integrated wellpads including 1-4 wells,  
208 to wellhead clusters of 2-24 wellheads distant from other well pad equipment. Across all  
facility types, ECMC wellhead reports provided metadata for 7,041 facilities (56%).

210 Since data sources provided only single point coordinates for each facility, manual and  
machine recognition of satellite imagery were used to assign outlines to facilities. Outlines  
212 were used to identify overlapped facilities, attach events and plumes to facilities, and to  
identify cases where two operators were co-located.

214 When no other metadata was available, flowline routing provided by ECMC was used to  
augment existing metadata. Flowlines are pipelines which connect wellheads to the liq-  
216 uid/gas separation equipment on wellpads. For example, a wellpad report record from  
CDPHE may have specified a wellhead location, rather than the wellpad location. As-  
218 suming the wellpad was detected by satellite recognition *and* a flowline between the two was  
reported, the flowline routing could be used to assign the misplaced wellpad metadata to  
220 the true wellpad location. A mapping example of production facilities is shown in Figure 2.  
This method recovered metadata for 360 facilities (2.9%).

222 Since all events reported by partners originated, by definition, from a facility, any event  
locations not matched to a facility from one of the public sources were added to the facility list  
224 (173/1.4% of facilities). These additions include pigging locations where pigging operations  
occurred and one pipeline leak location detected by the aircraft and verified by the study  
226 team.

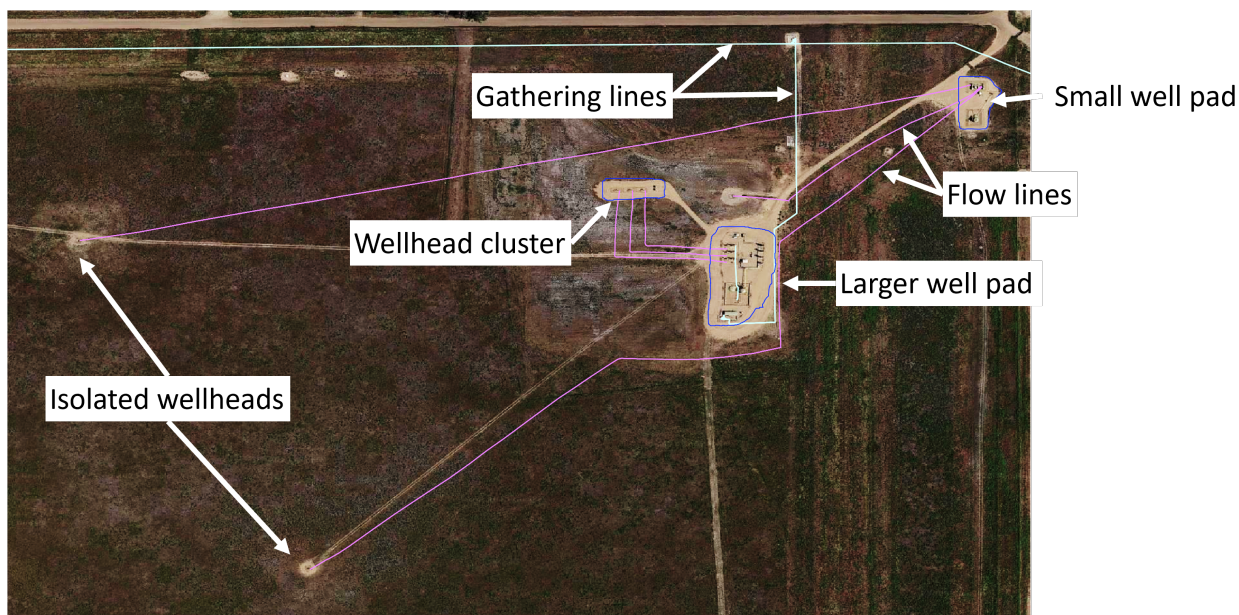


Figure 2: Wellpad facility example. Image shows two well pads, connected wellheads, and the flowlines connecting wellheads to wellpad. Gathering lines are also shown, including the connection originating at the larger wellpad. Satellite imagery from Google Earth™. Image was produced using QGIS™.

Because some facilities are large (spatial dimensions of hundreds of meters), assigning all  
 228 events and O&G-identified plumes to facilities provides the spatial alignment for the study  
 method. A plume was ‘aligned’ with an event if (a) the event was on the same facility as  
 230 the plume, and (b) the event was occurring at the same time as the plume. Uncertainty in  
 facility boundaries is discussed in SI Section S-3, and uncertainty in event and flight timing  
 232 in SI Section S-4.

## Compressor Emissions

234 In addition to episodic maintenance emissions, many compressor stations have multiple large  
 compressors. In the study area the median midstream station had 5 compressors totaling  
 236 12,100 HP (9.02 MW) (Figure S-11). Often vented and combusted (combustion slip) methane  
 emissions from these units may be larger than fugitive emissions at the facility.<sup>18,21,38</sup> The  
 238 majority of units utilized gas-fueled drivers (51% reciprocating engines and 18% turbines).  
 Engine exhaust contains significant methane from unburned fuel (‘combustion slip’) and

240 emission rates vary over two orders of magnitude depending upon the type of engine.<sup>39</sup>  
Since combustion slip is both hot and dilute (1000-2500  $ppm_v$  is typical<sup>39</sup>), it often does  
242 not form the well-defined plumes characteristics of cold point sources like vent stacks or  
leaks.<sup>40</sup> Combustion slip also occurs in heaters of gas upgrading equipment. Compressors  
244 also include large (2-5 kg/h) vented sources such as rod packing and shaft seals vents that  
are co-located with compressor driver emissions.

246 Midstream facilities may also include substantial fugitive emissions, such as blowdown,  
starter, and isolation valve leaks, which may be dispersed throughout the facility or combined  
248 into a few vent locations.

To compare with plume estimates, known compression and processing emissions for mid-  
250 stream facilities were estimated with common simulation methods<sup>13,39,40</sup> using an emission  
simulator.<sup>41</sup>

252 Finally, little information was available for compressors on production facilities, the  
largest of which could have emissions detectable emissions by the aircraft method. Aircraft  
254 detections of these sources could not be assessed.

## Event-Plume Matching

256 In simulation all events were assigned to a facility and either had reported or modeled start,  
end, and emitting times. These emission periods were compared to the timing of aircraft  
258 overflights, with uncertainty. In all cases, location was fixed and timing varied on each  
iteration, resulting in a probabilistic comparison between the events and the flights. Figure  
260 S-9 illustrates the result of an example event simulation, and Figure S-10 illustrates combined  
event and overflight simulations.

262 All confidence intervals in this paper are 95% empirical confidence intervals, unless oth-  
erwise stated.

## 264 Results and Discussion

### Facility Model

266 Table 1 summarizes the facility list. If a facility was detected in satellite photography, the  
 outline of the facility represents the area of disturbed ground around the facility’s equipment;  
 268 if not detected, a default size was utilized. Partners operate 85% of production facilities  
 and 69% of midstream facilities, providing an excellent basis for matching maintenance  
 270 events with aircraft detections. While most midstream facilities were operating, 59% of  
 production facilities were in an operating state, if wellhead clusters were counted as facilities.  
 272 Since shut-in facilities generally have lower emissions and fewer maintenance activities, the  
 approximately 5,000 shut-in facilities were unlikely to have either plumes or maintenance  
 274 events.

Table 1: Known Facilities in Study Area

Facility Type <sup>1</sup>	Operator Information				Total	Fraction Partner	Operating Status				Fraction Operating
	Multiple <sup>2</sup>	Other Known <sup>3</sup>	Partner	Unknown <sup>4</sup>			Operating	Shut In	Mixed Status <sup>5</sup>	Unknown	
Wellhead Cluster	0	1,258	5,784	4	7,046	82%	3,457	3,184	400	5	55%
Production	76	472	4,341	179	5,068	89%	2,879	1,572	164	192	66%
Pigging	2	5	139	128	274	95%	146	0	0	128	100%
PreAndProduction	1	17	64	0	82	78%	74	1	0	5	99%
Gathering	1	20	47	0	68	69%	57	8	2	1	88%
Pre-Production	5	5	25	0	35	71%	0	0	0	35	
Other	0	0	2	16	18	100%	2	0	0	16	100%
Processing	0	5	11	0	16	69%	14	1	0	1	93%
Pipeline	0	0	15	0	15	100%	15	0	0	0	100%
Oil Handling	0	6	1	0	7	14%	7	0	0	0	100%
Total	85	1,788	10,429	327	12,629	85%	6,651	4,766	566	383	60%

<sup>1</sup> See SI for complete facility type definitions. Note that wellpads are divided into three categories reflecting how the facilities were reported to the Colorado GHG reporting program: ‘Pre-Production’ indicates well development activities with no regular production, ‘PreAndProduction’ indicates the wellpad transitioned from pre-production to production during the reporting year, and ‘Production’ indicates active production with no pre-production activities. Any of the above may be operating or shut in.

<sup>2</sup> Indicates that metadata from two operators was geospatially coincident, such that a specific operator could not be identified. For example, wellheads co-located on a newer wellpad run by a different company.

<sup>3</sup> Operator is known, but is not a study partner.

<sup>4</sup> Indicates the facility location had no spatially co-located metadata from public data sources; see text.

<sup>5</sup> Meta data indicated a combination of operating and non-operating status. For example, a wellhead cluster with a combination of operating and shut-in wellheads.

## Event Timing

Partners reported events for approximately 44 days, compared to 18 days of aircraft flights; these extra days provided more robust characterization of event timing for simulation purposes. Reported events occurred on all days of the week, but since most were maintenance activities that required on-site personnel, significantly more events occurred on weekdays – 113 [1 to 182] events per day – than on weekends and holidays (July 5) – 50.6 [1 to 85] events per day (Figure S-4). Most events occur during working hours, with a slight bias toward starting prior to noon (67% of events). Start time data are summarized in Figure 3, overlaid with the start time of flight legs. Since flights are temporally aligned with maintenance events, a reasonable hypothesis is that some fraction of the plumes detected by aircraft would be maintenance events.

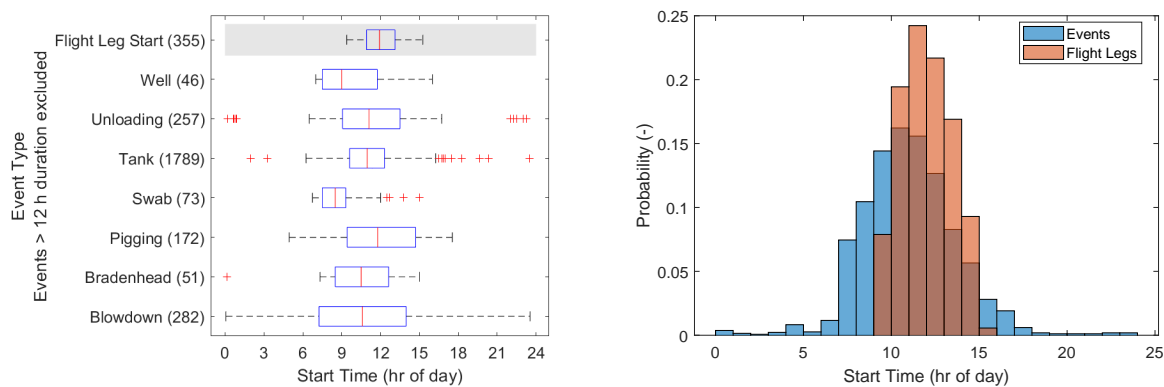


Figure 3: Summary of start times for events where the start time was specified. Left panel shows start times by event type. Boxes show inner quartile and median, whiskers 1.5x inner quartile, and points are outliers. For reference, the start of every flight leg in the study is also shown, shaded gray. Right panel overlays histograms of start times for all events and for flight legs. Since flight legs are 8.4 [0.86 to 12] minutes long, the histogram of flight leg starts is indicative of when the aircraft overflies facilities. In contrast, emitting periods for events may occur minutes to hours after the start of the event. Therefore, active emission periods for events are shifted right from start times shown in right panel.

## 286 Plumes Discovery Rate

Methane detection plumes from the aerial survey were classified by the aerial team as O&G,  
288 agricultural, or waste management, all of which were landfills. Excluding pigging locations,  
0.898 plumes were detected per 1000 facilities overflowed ( $R^2=0.766$ , Figure 4). On weekdays,  
290 the plume discovery rate was  $0.988 \frac{\text{plumes}}{1000\text{sites}}$  ( $R^2=0.867$ ), while the weekend discovery rate  
was substantially lower at  $0.702 \frac{\text{plumes}}{1000\text{sites}}$  ( $R^2=0.133$ ), or 71% of weekday rate. These data  
292 suggest that some emission process or processes differ between weekends and weekdays for  
emission types large enough to be detected by the aircraft method; a logical hypothesis is  
294 that these are due to human intervention on the facilities.

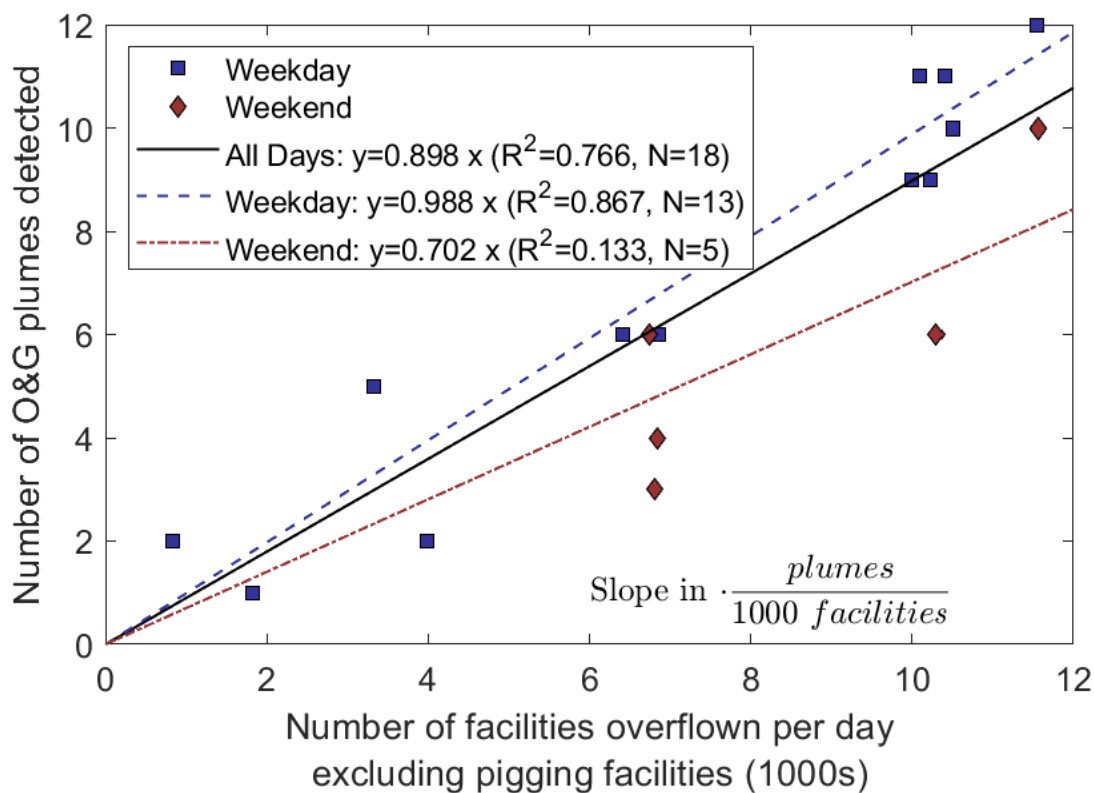


Figure 4: Across all flight time, there is a strong relationship between the number of O&G plumes identified per day and the number of O&G facilities overflowed. While there are few points and low  $R^2$  for weekends and holidays, data indicate weekend detections were 71% of detections on weekdays.

## Plumes Detecting Events

296 Matching is shown in Table 2, grouping plumes by the type of plume-facility-event match.  
The table should be read as a ‘decomposition’ of the emissions detected by aircraft, starting  
298 at the top (Group A) with the most general subdivision, to the most specific at the bottom  
(Group C). Only Group A considers non-O&G plumes.

300 Since the aircraft may overfly a facility on two sequential passes, a few minutes apart,  
columns distinguish between individual plumes and revisits during one day; in all cases the  
302 revisits are within  $\frac{1}{2}$  hour. Plume counts eliminating same-day revisits are called ‘detections’  
in this discussion.

304 Group A considers all plumes as classified by the aerial team into O&G and non-O&G  
(waste and agricultural) locations. Qualitative examination of the single non-O&G plume  
306 location spatially matched to O&G facilities indicated that the emissions likely did not orig-  
inate with O&G operations, but with surrounding agricultural operations. O&G accounted  
308 for two thirds of emissions estimated from plumes. Group B splits the O&G plumes based  
upon spatial matching to midstream and production facilities. Approximately two thirds of  
310 O&G plumes and estimated emissions were coincident with production facilities.

Group C divides the O&G plumes into categories suitable for discussing plume attribution  
312 in detail. First, we consider plumes which could not be assigned to a known facility. These  
fall into two categories:

- 314 • *Leak found during study*: (6.5% of plumes, 1.9% [1.3% to 2.5%] of O&G by emissions)

This classification includes one pipeline leak discovered by overflights and confirmed  
316 by the study team and operator personnel during field work. The leak represented a  
persistent emitter, detected 8 times in 4 flights during July 2021. Due to the repeated  
318 detections, the fraction of plumes exceeds the fraction of emissions attributed to the  
leak.

- 320 • *Not on any known facility*: (3.3% of plumes, 19% [13% to 25%] of O&G by emissions)



Table 2: Plume-Event Matching Results

Description	Number of Plumes				Total aerial emissions (Mg CH <sub>4</sub> /hr) <sup>4</sup>	Fraction of plumes <sup>5</sup>	Fraction of estimated emissions
	Total plumes	Detections (plumes without revisits) <sup>1</sup>	Matched to facilities <sup>2</sup>	Matched to known event <sup>3</sup>			
<b>(A) All Plumes</b>							
Non oil and gas	65	57	1	0	16.6 ±2.35	35%	34% ±5.5%
Oil and gas	123	113	111	22	31.7 ±2.9	65%	66% ±8%
<b>(B) Breakdown of oil and gas plumes:</b>							
On no known facility	12	8	0	1	6.63 ±1.75	9.8%	21% ±5.9%
On midstream facilities	29	27	29	12	4.89 ±0.871	24%	15% ±3.1%
On production facilities	82	78	82	9	20.2 ±2.19	67%	64% ±9.1%
<b>Total oil and gas</b>	<b>123</b>	<b>113</b>	<b>111</b>	<b>22</b>	<b>31.7 ±2.94</b>	<b>100%</b>	<b>100% ±13%</b>
<b>(C) Summary by sector and availability of event information:</b>							
<i>Plumes on no known facility:</i>							
Confirmed pipeline leak	8	4	0	1	0.595 ±0.182	67%	9% ±3.9%
No known facility	4	4	0	0	6.04 ±1.72	33%	91% ±37%
<b>Total (no facility/total O&amp;G)</b>	<b>12</b>	<b>8</b>	<b>0</b>	<b>1</b>	<b>6.63 ±1.75</b>	<b>9.8%</b>	<b>21% ±5.9%</b>
<i>Plumes on non-partner production facilities (no event info):</i>							
<b>Total (non-partner prod/total O&amp;G)</b>	<b>17</b>	<b>16</b>	<b>17</b>	<b>0</b>	<b>5.01 ±1.11</b>	<b>14%</b>	<b>16% ±3.8%</b>
<i>Plumes on partner production facilities:</i>							
Matched to event (Stage 1)	6	6	6	9	1.08 ±0.575	9.2%	7.1% ±3.9%
Matched to event (Stage 2)		23.7 ± 4.17			6.2 ±1.87	37% ±6.5%	41% ±13%
Unmatched to event (Stage 2)		24.2 ± 4.18			5.02 ±1.75	37% ±6.4%	33% ±12%
No Stage 2 Info	11	11	11	0	2.9 ±0.881	17%	19% ±6.3%
<b>Total (partner prod/total O&amp;G)</b>	<b>65</b>	<b>62</b>	<b>65</b>	<b>9</b>	<b>15.2 ±1.91</b>	<b>53%</b>	<b>48% ±7.5%</b>
<i>Plumes on midstream facilities:</i>							
Partner, known cause	9	7	9	3	0.699 ±0.178	31%	14% ±4.6%
Partner, unknown cause	14	14	14	6	2.87 ±0.608	48%	59% ±17%
Non-partner	6	6	6	4	1.32 ±0.619	21%	27% ±14%
<b>Total (midstream/total O&amp;G)</b>	<b>29</b>	<b>27</b>	<b>29</b>	<b>12</b>	<b>4.89 ±0.874</b>	<b>24%</b>	<b>15% ±3.1%</b>

<sup>1</sup> Counts cases where the aircraft overflow, and detected, the same location twice in one day as one overflight.

<sup>2</sup> Plumes were within 60 m of a known facility. One plume may be within that distance of multiple known facilities.

<sup>3</sup> A reported event was occurring at the facility during the time of overflight.

<sup>4</sup> In cases where the aircraft detected emissions at the same facility on the same day, the average emission estimates for that location is used.

<sup>5</sup> Fractions are computed relative to the total number of plumes or total emissions in the lettered grouping in the table. May not sum to 100% due to category rounding.

Each detection had a single plume detected more than 60 m from the edge of any known facility. SI Section S-7 discusses each plume and provides satellite imagery.

One plume (C-4) was clipped by the field-of-view of the aircraft instrument, and may have originated on a facility.

The remaining three plumes (C-1 to C3) were near visible linear scars which possibly indicated pipeline rights-of-way, but no pipelines reported to ECMC were near these

features. Emission estimates for these plumes were approximately 310, 500, and 3,900  
328 kg CH<sub>4</sub>/h, and included the largest plume estimate in the study.

Two hypotheses may explain these plumes.

- 330 1. The plumes were caused by pipeline leaks. This hypothesis is unlikely, as each  
detection occurred only once in many overflights, and since pipeline leaks are  
332 typically continuous emitters, at least the two larger plumes should have been  
detected on every overflight.
- 334 2. The plumes were due to a short, high-rate, event (e.g. a blowdown), that had  
detached from its source location while moving downwind, but were not dispers-  
336 ing into background methane concentrations as expected. This hypothesis raises  
concerns about the emission rate estimate: Plume emission rate calculations make  
338 assumptions about transport of emissions assuming a stationary emission point.  
If the plume moved *en masse* with the wind, it is unclear if the emission rate  
340 estimation method would adapt to this unusual condition.

Since these three plumes represented  $\approx 15\%$  of all emissions estimated by aircraft for  
342 this study, uncertainty about cause and estimated rate is material to basin-scale emis-  
sion estimates derived from aircraft plume estimates. More broadly, most aerial studies  
344 do not have the complete facility list utilized here and therefore would struggle iden-  
tifying plumes unattached to a likely emitter; no such analysis was conducted in any  
346 study known to the authors. This type of plume classification therefore represents an  
uncertainty of unknown size in emission studies using plume estimates.

348 Next, we consider plumes spatially aligned to production facilities. Since no event data  
was available for non-partner facilities, no matching simulation was possible for the 17 plumes  
350 on these facilities.

The remaining matches – about half of all plumes (53% of O&G plumes and 48% [41%  
352 to 56%] of O&G emissions) – answer for production the key question posed earlier: What

fraction of aircraft detections are known emission events? This analysis has four steps:

- 354 • *Matched Stage 1:* (4.9% of plumes, 3.4% [1.7% to 5.3%] of O&G emissions). Double-blind matching of plumes to reported maintenance events resulted in 6 matches to 9  
356 possible events, see Section S-8 for images and analysis.

In 5 of 6 cases, the plume location aligns well with the event's characteristics (Confidence='Yes' in Table S-7). Additionally, the matched events for all five are known  
358 to have instantaneous emission rates which would likely be detectable by the aircraft method. The final case is unclear primarily due to the lack of transport of the plume  
360 (low winds). For this analysis it was considered a valid plume-event match.

362 Therefore, at a minimum 9.2% of plumes and 7.1% [3.5% to 11%] of production emissions were due to known events. In this case, all events were due to maintenance  
364 operations.

- 366 • *Matched Stage 2:* (19% [15% to 23%] of plumes, 20% [13% to 26%] of O&G emissions). Substantially more plumes were matched during the Stage 2 unblinded matching. Partners were sent a formatted document, including information about all production plumes unmatched in Stage 1, and GIS files for plumes and the context camera  
368 image. Partners responded back to the study team with possible operational explanations for 39 of the 51 plumes, summarized in Table 3, including both maintenance  
370 operations and other known emission events. Analysis of each response is listed in SI  
372 Section S-9.

The three largest categories provide insight into possible explanations for plumes. First,  
374 when Stage 1 events were transmitted to the study team, pre-production operations were excluded from reporting at the request of the partners (likely due to ongoing regulatory discussions). During Stage 2 analysis,  $\approx 20\%$  of plumes on partner production facilities were aligned with pre-production operations, some of which are known  
376 to have periodic emissions large enough to be detected from aircraft. All of these are  
378

Table 3: New Information from Partners During Stage 2 Matching

New Information Type	Assigned Probability <sup>1</sup> Plume Matched Event				Total Plumes	Weighted Plumes <sup>2</sup>
	0%	10%	50%	90%		
Pre-Production	0	0	0	11	11	9.9
Omitted from Stage 1 Reports	0	4	9	5	18	9.4
Timing	0	0	0	5	5	4.5
Spatial Matching Issue	0	0	0	1	1	0.9
No Information	4	0	0	0	4	0
Unmatched	12	0	0	0	12	0
Total	16	4	9	22	51	24.7

<sup>1</sup> Each Stage 2 plume match was assigned a probability that the described event was matched by a plume; see text for additional details.

<sup>2</sup> Plume count weighted by *Probability of Match*.

likely detections of known pre-production operations. Note that while *reported* implies  
 380 that emissions were included in regulatory reporting, this study had insufficient data  
 to analyze whether total reported emissions were accurate.

382 An additional third of proposed matches were due to data omitted from Stage 1 reports  
 for a variety of reasons (see SI). Each of these was assigned a probability depending  
 384 upon how well the explanation matched observed plume location and behavior. The  
 third category, *Timing*, were due to relatively small differences between reported time  
 386 and aircraft overflight times.

Given given plume weightings in Table 3, Stage 2 results indicate that an additional  
 388 37% [29% to 43%] of plumes and 41% [28% to 55%] of production emissions may  
 have been related to known emission events for partner facilities where event data was  
 390 available.

- *Unmatched Stage 2*: (20% [16% to 24%] of plumes, 16% [11% to 22%] of O&G emis-  
 392 sions) These plumes and facilities had stage 2 data, but remained unmatched, con-  
 sidering both lack of any likely operational cause and probability weighting when a  
 394 possible operational cause was provided.

- *No Stage 2 info*: (20% [16% to 24%] of plumes, 16% [11% to 22%] of O&G emissions)

396 Due to delays in acquiring CDPHE data to finalize the facility list, Stage 2 matching  
was performed on a partial facility list, and these 11 plumes were later matched to the  
398 improved facility list in June 2023, illustrating the importance of a complete facility  
list for this type of analysis. To minimize possible confirmation bias, Stage 2 matching  
400 was not repeated with these plumes. Lack of analysis for these plumes indicates that  
some valid plume-event matches may have been omitted from the totals.

402 Combining Stage 1 and 2 matches provides a reasonable high (but not upper) bound on  
the fraction of plumes matched to known emission events: 46% [38% to 52%] of plumes, and  
404 48% [35% to 62%] of emissions, on production facilities. It is reasonable to assume that, had  
operational and event data been available for non-partner production, a similar fraction of  
406 plumes could be matched to events.

The final subdivision in Table 2/Group C considers plumes on gathering compressor  
408 stations and gas processing plants; no plumes were spatially aligned with remote pigging  
locations.

410 As noted earlier, midstream facilities often include equipment with significant combusted  
and/or vented emissions, including combustion slip from compressor drivers and gas upgrad-  
412 ing equipment, and venting from centrifugal compressor seals and reciprocating compressor  
rod packing when those units are pressurized.<sup>13,39</sup> All above sources tend to be concentrated  
414 near compressor units or upgrading equipment, which in the DJ basin are typically housed in  
large buildings that disturb winds and may cause pooling of emissions.<sup>40</sup> Major equipment  
416 on midstream facilities operates most of the time (Figures S-11 to S-13); many large units  
operate more than 95% of the time, and few midstream facilities have long periods with no  
418 compression or processing in operation. Therefore, on these facilities, the emissions should  
be detectable by aircraft on nearly all overflights, or, alternatively, may be too diffuse and  
420 seldom/never detected. In the latter case, aircraft estimates would be lacking and would  
need to be replaced using non-aircraft estimates to calculate basin emissions.

422 However, data from this study suggest that many, if not the majority, of plumes on  
midstream facilities represented detections of known vented and combusted sources, and  
424 that the probability of detecting these emissions on any given overflight was unpredictable.  
We cover these two points in turn:

426 • *Most plumes detected combusted and vented emissions:* Approximately 20% of mid-  
stream plumes show visible transport where the origin of the plume can be clearly  
428 identified on the facility (Table S-8). The remainder of plumes show little transport;  
the plume indicates a general methane enhancement, typically over the main equipment  
430 at the facility. Figure 5 and Table 4 illustrates that facilities with multiple detections  
generally have higher estimated emissions, and that in the majority of cases when a  
432 facility had more than one plume, the plume was located on the same location on each  
detection, over the compressor building (Table S-8). Figure S-26 shows plume location  
434 for the facility with 7 plumes co-located over a compressor building housing 4 large  
two-stroke lean burn engines, which have high methane emissions from combustion  
436 slip.

However, not all midstream plumes are consistent with compressor or processing emis-  
438 sions. Midstream facilities may also have large fugitive emissions, notably from isola-  
tion and blowdown valves, valves on liquid separation equipment, or combustion issues  
440 with flares.<sup>13,21,40,42</sup> These fugitive sources tend to be located away from compressors  
or processing equipment, and are typically concentrated point sources. Figure S-27  
442 shows an example for a facility with 2 plumes co-located over the compressor building,  
and two plumes possibly indicative of fugitive emissions.

444 These data suggest that the majority of midstream plumes may be explained by de-  
tections of known compression and processing emissions.

446 • *Unpredictable detections:* Figure 5 also illustrates that (a) even facilities with multiple  
plumes were detected on less than half of overflights, and (b) many facilities with sim-

448 ilar modeled emissions were never detected. The nature of midstream facilities make  
 450 both of these results unsurprising. Location of exhaust stacks from compressor drivers,  
 or compressor vents interconnections, differ between facilities. These differences may  
 452 concentrate or disperse emissions, raising or lowering the probability of that emis-  
 sions will be concentrated enough to form a detectable plume. The size and shape of  
 buildings, interacting with changing wind direction and speed, likely change emissions  
 454 transport and plume visibility.

Data indicate that the probability that a given midstream facility will be detected ap-  
 456 pears low, is somewhat dependent on the size of compression and processing emissions,  
 and is unpredictable between overflights.

Table 4: Plumes spatially aligned with midstream facilities

Facility Type	Number of Plumes <sup>1</sup>			Total By Facility Type	Fraction Multiple Plumes	Fraction At Least One Plume
	No Plumes	One Plume	Multiple Plumes			
Gathering	42	5	2	49	4.1%	14%
Oil Handling	6	0	0	6	0%	0%
Processing	8	1	4	13	31%	38%
Total	56	6	6	68	8.8%	18%
Median Emissions (kg/h)	11.4	16.8	33.4			

<sup>1</sup> Number of plumes spatially aligned with midstream facilities; see text.

458 Combined, these two results indicate that midstream plumes were unlikely to be repre-  
 sentative of known combustion and vented emissions at facilities, and it is highly unlikely  
 460 that aircraft plumes primarily detected only fugitive emission sources that are additive to  
 known combustion and processing emissions.

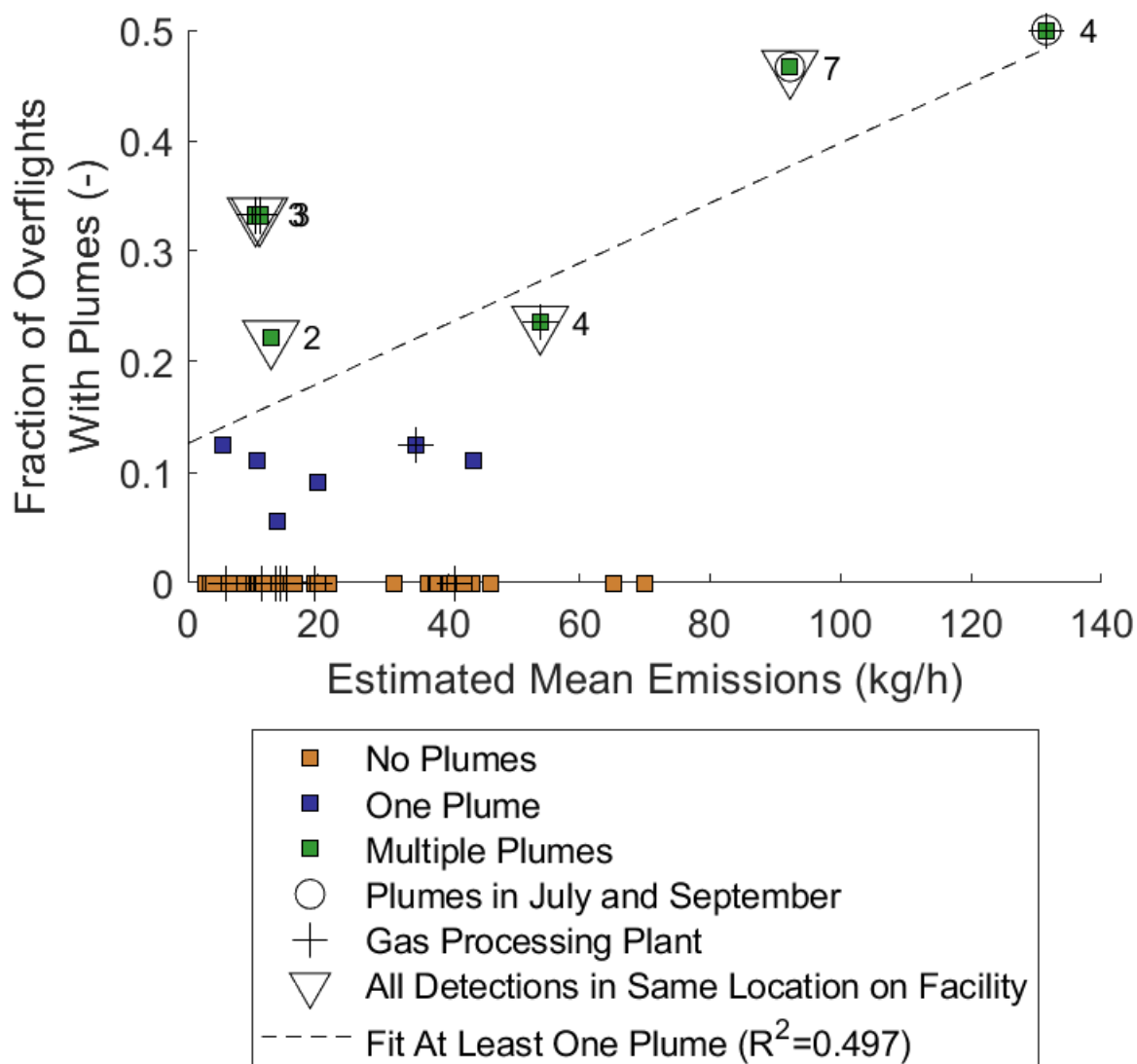


Figure 5: Characteristics of midstream detections. Each midstream facility in the study area is represented by one point, colored by whether multiple, one or no plumes were detected on the facility. Overlays indicate processing plants and whether a facility was detected in both July and September flights. For facilities with multiple plumes, a triangle indicates if all plumes were on the same location at the facility; in all cases the location was over the compressor house.

## 462 Implications

Typically aerial plume detections are scaled to basin emissions by adding plume totals, 464 potentially weighted by a ‘persistence’ estimate based upon what fraction of overflights



resulted in a plume at a particular location.<sup>24,28</sup> There are two implicit assumptions in this  
466 scaling method: (a) that the probability of detecting a plume is representative of all time,  
i.e. 24 hours per day, 7 days per week, and (b) that detections are equally probable for the  
468 same source on all overflights. Data from this study indicates that both assumptions are  
not wholly correct, and that scaling from aerial detections to basin emissions requires more  
470 analysis and conditioning than is currently applied.

Data from this study indicate that flight timing preferentially identifies maintenance  
472 emission sources, as indicated by both plume-event matching and weekday-weekend analy-  
sis. Given the number of facilities and maintenance events, these detections are also more  
474 prevalent on production facilities; between 7.1% [3.5% to 11%] and 48% [35% to 62%] of emis-  
sions attributed to production were likely due to detecting known pre-production sources or  
476 episodic maintenance events. Since these emitters are typically short duration and highly  
variable, the estimated size of each emitter will be highly uncertain, and scaling to basin  
478 estimates would need to account for both this uncertainty and emission durations substan-  
tially below 24 hours per day. Neither of these issues is currently included in recent studies  
480 when scaling aerial emissions to basin scale. Insufficient data was available to assess the net  
impact of this issue, which is impacted by fraction of maintenance events seen, the accu-  
482 racy of plume estimates for highly variable and transient events, and the duration of known  
emission events.

484 In contrast, plume detections on midstream facilities indicate that major, known, emission  
sources are infrequently and unpredictably identified. Many midstream facilities with known  
486 large emissions were never detected by aircraft methods, and no midstream facility, even  
those detected multiple times, was detected in more than half of overflights. These data  
488 indicate that midstream emissions - even known, reported, large emission sources - are not  
detected in a representative fashion by the aircraft method used in this study. The impact  
490 of this issue is difficult to assess, but data suggest that midstream emissions estimated by  
plumes may be significantly low; detection frequencies below 50% alone suggest midstream

492 emissions estimated this way could be half actual emissions, assuming individual plume  
estimates are correct and unbiased.

494 Plumes from this study attribute one fifth of detected emissions to midstream and two  
thirds to production. In contrast, state greenhouse gas reports for reporting year 2021  
496 indicate include 14,400 metric tons of methane emissions from midstream and 8,000 metric  
tons from production - two thirds midstream, predominantly due to known compression and  
498 processing emissions. Results from this study illuminate this disagreement. Data developed  
here indicate that maintenance and other known, short-duration, emitters are likely over-  
500 represented in aerial detections on production facilities, while unpredictable detection of  
known, long-duration, emission sources at midstream facilities are likely under-represented  
502 in aerial detections.

It is unclear how the issues identified here would translate to other production basins  
504 or to other aircraft methods that utilize plume detection; additional study is warranted.  
However, it is unlikely that the issues identified here are totally absent from other basins.  
506 Aerial emissions surveys remain highly useful for assessing production basin emissions. How-  
ever, results from this study suggest that additional data inputs (particularly correct and  
508 complete facility GIS data), a more nuanced analysis of emission persistence and frequency,  
and improved sampling strategies are required to accurately scale plume estimates to basin  
510 emissions.

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646 TOC Graphic

