

Environmental Newsletter

Quarter 1

**TECHNICAL
EXPERTISE**

**Brought
Into FOCUS by
INDUSTRY
LEADERS**

All,

I hope this email finds each of you safe and in good health. During these virtual times, a main priority for the GCA environmental committee is to communicate regularly with all members and interface on these new and challenging times our industry faces. Moving forward, I will be sending out a quarterly update to provide all members up to date and accurate regulatory and committee information.

White House Happenings - recap

The Biden/Harris administration has issued a multitude of executive orders. All of which promise to be aggressive and potentially impactful to GCA members and customers. Specifically, Trump authored technical and policy rules regarding methane are being targeted for change immediately. However, on the bright side those rules will remain in place until new rules are promulgated. While it is expected that the Biden methane rule promulgation will be aggressive and set out to impact both existing and new sources, significant progress in rule making is only tentatively scheduled for summer of 2021.

New Mexico Methane Strategy – Draft Ozone Precursor Rule for Oil and Gas Sector

On or about February 4, 2021 I had a brief telephone call with the State of New Mexico requesting an update on the Draft Rule. At this time, several comments are still being addressed and an “official,” update to the public is not planned until summer 2021. Step2 Compliance sent out a “Regulatory Update,” recently stating that the OCD rules have a hearing scheduled for February 11, at which time the commission will likely take action to adopt the rules. I wanted to assure everyone New Mexico’s official response was that no meeting is being held.

GCA Environmental Committee - What is Happening

As GCA environmental committee members it is our duty to work toward protecting our industry while promoting environmental sustainability. As these new rule – making initiatives trickle down to the state level it is vital that our committee stay engaged. All suggestions on how to help make that happen are encouraged and appreciated.

COVID-19 has left us without the opportunity to have in person interface and likely, it will be 2022 before a GCA Expo and Conference takes place. During this time having virtual conferences on upcoming rulemaking will be taking place. Recommendations on technical platforms and time frequencies for these would be great.

Colorado Climate Action Plan to Reduce Pollution –

Regulation 3 & 7

*****PLEASE SEE THE NEW REGULATION 7 ENGINE EMISSION LIMITS, EFFECTIVE 2/14/2021*****

The Oil and Gas Program of the Air Pollution Control Division published a new FAQ Volume 5 to aid operators in implementation of requirements pertaining to routine or predictable gas venting at oil and natural gas operations.

FAQ Volume 5 includes specific guidance pertaining to General Permit GP11, traditional construction permits for these emissions, APEN Form APCD-213, and PS Memo 20-04.

FAQ Volume 5 and previous FAQ volumes are available here:

<https://cdphe.colorado.gov/oil-and-gas-and-your-health/oil-gas-compliance-and-recordkeeping>

A copy of GP11 is available here:

<https://cdphe.colorado.gov/general-air-permits>

UPCOMING REGULATORY MEETINGS –

In response to the “Climate Action Plan to Reduce Pollution”, known as [House Bill 19-1261](#), and the [Greenhouse Gas Pollution Reduction Roadmap](#), the CDPHE has commenced a process to develop rules to address greenhouse gas emissions from the oil and gas industry. You are invited to attend upcoming public meetings on this subject.

Public Listening Session
Thursday, March 4, 2021
6:00 - 8:00 pm

[Register Here](#)

Public Stakeholder Meeting
Thursday, March 25, 2021
6:00 - 8:00 pm

[Register Here](#)

Texas Commission on Environmental Quality - Revisions to Oil and Gas General Operating Permits (GOPs) Numbers 511, 512, 513, and 514

The revised GOPs were proposed on November 13, 2020, and the public comment period closed on December 16, 2020.

https://www.tceq.texas.gov/permitting/air/nav/air_genopermits.html

Should anyone have any other regulatory updates pertaining to other states please send that information along so that the GCA can be proactively involved. As always if there are any questions or the need for specific documents please feel free to contact me at any of the numbers or email listed below.

Thanks again for everyone’s continued support,

Dalyce M. Watson, M.A. ENV LAW
Environmental Specialist
Office: (903) 291.2742
Cell: (903) 331.8264
dhooper@jwenergy.com

122 Dovel Road
Longview, TX 75605

