

Environmental Meeting

Workshop

Round Rock, Texas
June 29, 2022

**TECHNICAL
EXPERTISE**

Brought
Into FOCUS by

**INDUSTRY
LEADERS**

NSPS 0000 & Beyond Update

- Potential Comment Topics
- Next Steps

New Mexico Brief Update

- Potential Timing Review
- Update as of June 26, 2022

Goals for Convention

- Website
- Presentation Topics
- Publisher Newsletters

Step2 Compliance

- Review of Services
- Vote Method



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 Summary

WELL SITES – DEFINITION MADE CLEAR

As a reminder - “wellhead only well site,” (Defined by the 2020 Technical Rule) means “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.

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.

the EPA is proposing to amend the 2016 NSPS 0000a to include the above referenced definition meaning that all NSPS 0000a effected compressors at well sites would *NO LONGER BE EXEMPT*.

NSPS 0000b Summary

- 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

NSPS 0000c Summary

- 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

NSPS 0000 Potential Comment Topics & Action Items TECHNICAL

- **Potential Comment No. 1** – identity or request declaration of owner or operator responsibility.
 - Action Item – Identify conveyance of potential responsibility disputes
 - Action Item – Read through historical comments published to original NSPS 0000 and NSPS 0000a related to owner or operator responsibility.
- **Potential Comment No. 2** – Clarify or request the use of NSPS 0000b annual flow meter methodology to apply retroactively to newly effected NSPS 0000a units.
- **Potential Comment No. 3** – Provide a testing methodology guidance document for the use of an annual flow meter and compliance schedule
 - Action Item – Reach out to flow meter developers for commentary and potential help regarding testing methodology. POTENTIAL SOURCES – ECOMM and TESTO
- **Potential Comment No. 4** – Provide commentary on unachievability of serial tracking related to pneumatics.
 - Action Item – Identify Experts
 - Action Item – Update previous commentary submitted for NMED EIB deliberation related to “tagging.”
 - Action Item – Draft language related to the mootness of tracking while utilizing instrument air

NSPS 0000 Potential Comment Topics & Action Items Timeline

1. Assign GCA members to comment topics and develop “sub groups.”
2. Draft commentary list in order of GCA committee importance
3. Draft fluid and sensible commentary headers
4. Draft summary statements of potential commentary headers
5. Outreach to potential experts and flow meter developers with applicable summary to convey goals and obtain supporting documentation where applicable.

NSPS 0000 Potential Comment Topics & Action Items LEGAL

Potential Comment No. 5 – NSPS 0000c existing vs. new equipment under the umbrella of NSPS legal overreach

Action Item – Reach out to Bracewell informally to ask about this topic

New Mexico Timeline Review

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

From that filing the board had 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 satisfied EIB's April 25 deadline to "reach its decision."

BELOW IS POTENTIALLY WHAT WILL OCCUR

EIB' 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.

New Mexico Timeline Update

WHAT ACTUALLY OCCURRED

EIB' counsel presented "Statement of Reasons" ("SOR") on Sunday June 26, 2022, which shows that the EIB was in favor of NMED's changes per our advocacy effort.

HUGE WIN– GCA & positions/ arguments were cited by the EIB 52 times, more than any other oil and gas advocacy group, except NMOGA.

(All statistics were kindly provided by Bill Bowes and his team at Archrock- many thanks)

Last step before the rule becomes effective - publication by the State Records Administrator in the NM Register

Where you can go to check on the publication date:

<https://www.srca.nm.gov/nmac-home/new-mexico-register/>

Something to Note: Consistently the NMED only referenced this applying to certain counties and has stayed true to form, on page 38 of the SOR the EIB notes that the rule applies in the following counties: Chaves, Dona Ana, Eddy, Lea, Rio Arriba, Sandoval, San Juan and Valencia. Other counties can be added later if they are found to exceed 95% of the NAAQS for ozone via the process detailed on page 40 of the SOR. Once in, a county remains in except as provided on pages 40 and 41.

Convention Goals - Website

- **Action Item** - Identify and meet with an individual to clean up the current configuration of the environmental website and gain access to regularly update files without approval.
- **Action Item** - Update environmental site message
- **Action Item** - The Committee Page shows all committees in the left pane - adjust this to reflect only environmental page links with drop down menus for search expansion.
- **Action Item** - More user-friendly login and accessibility
- **Action Item** - Post a copy of the current members of the committee and include:
 - A. Short bio
 - B. Picture
 - C. Contact Information - including Title and company logo
- **Action Item** - Develop a document management system that requires login credentials for certain items
- **Action Item** - Update the public forum documents

Convention Presentation Topics

1. Environmental Challenges, *Industry Wide* – A collaborative effort with key committee members to develop a presentation explaining current and future environmental challenges faced by all to be offered to technological and equipment members for potential solutions.
2. Regulatory 101, *A Leadership Crash Course* – A presentation for future company leadership on the incorporation of environmental understanding into management decision making.
3. Step2 Compliance Rule Update – No topic provided as of yet.

Step2 Compliance Goals

1. Provide updates configured for the GCA and run an email campaign customizable based off input from the GCA.
2. Offer rule tracking technology to the GCA where the addition of any environmental concerns or agency to a digital platform may be changed to track items of concern in real time.
3. Provide an annual update presentation incorporated into the GCA convention to summarize the state of environmental legislation and present to the membership at a time that does not compete with other presentations.
4. An exclusive role in being the environmental expertise that runs continual rule updates/summaries, provides real time updates, quarterly summaries and an annual state of the nation update at the GCA convention.

GCA Responses to Step2 Compliance Goals

GCA Responses to Goals 1 and 2:

1. Is the rule tracking/summary initiative the summaries you provide many of our current members? .

Step2 Compliance Response: Yes.

2. Can you expand on the term, “email campaign?”

Step2 Compliance Response: We use a service to send out emails currently and are referencing our team managing this for the updates that would go out to the GCA. Some type of email management utility is required as you will get blocked if you just try to send a large group email.

3. The environmental committee is very interested in Step2 Compliance providing an email subscription service that lets each committee member know of POTENTIAL rule making initiatives, is this something Step2 Compliance can do? .

Step2 Compliance Response: Yes. **(CONCERN)**

GCA Responses to Step2 Compliance Goals

GCA Responses to Goals 3:

2- 3 speaking slots have been negotiated with the expo committee chair, Step2 Compliance may have one of those slots pending the requirements outlined below:

- The presentation would need to be submitted by February 1, 2023, or 60 days before the expo begins, whichever comes first, moving forward.
- A technical expert from the environmental committee will be assigned to review the presentation based on subject matter, followed by the chairperson of the committee. If the committee representatives agree with the presentation, we will submit it to the Expo committee for final approval.

GCA Response to Goal 4:

The GCA will agree to Step2 Compliance providing an exclusive role for items provided to the GCA for the length of services rendered. **(CONCERN)**

CLICK ME TO VOTE <https://www.surveymonkey.com/r/ZQRGJ7S>

RESOURCES & INFORMATION

1. On the previous page was a survey monkey link to vote on Step2 Compliance involvement with the GCA Committee. That link is again listed below. Should your link not work, please just send me a quick email and I will mark you down. <https://www.surveymonkey.com/r/ZQRGJ7S>
2. On Tuesday, June 5th I will send the updated EIB SOR of the 20.2.50 Rule along with this power point presentation
3. I will provide an email when 20.2.50 becomes published and keep everyone up to speed on NSPS 0000 comments and the outcome of Step2 Compliance



Questions?

Please contact

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