

*Presentation to:*

# Rocky Mountain EHS Peer Group EPA's Information Collection Request

EPA ICR No. 2548.01  
October 20, 2016

*Presented by:*

**Chad Powell**

Rocky Mountain EHS Peer Group



**LT Environmental, Inc.**  
COMPLIANCE / ENGINEERING / REMEDIATION

# Agenda

- History of the ICR Process
- EPA ICR No. 2548-01
- Who is Required to Report
- Contact Information & Comments
- Part 1 and 2 Surveys
- Deadlines
- Action Items



# History of the ICR

- Information Collection Request (ICR)
- General history
- Historical uses
  - Collecting information to pursue penalties
  - Develop regulations for existing industries



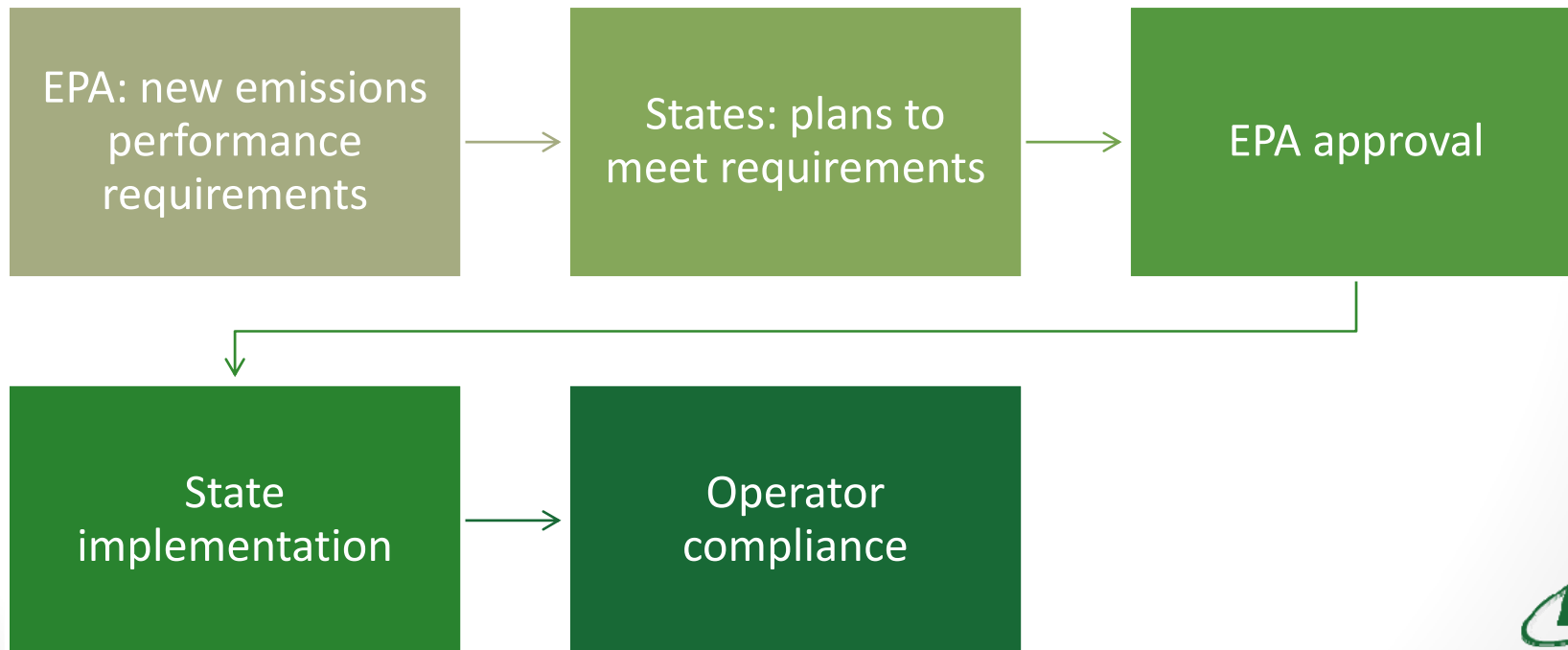
Power plant  
industry in  
2010

MACT Boiler  
ICR in 2012



# ICR Process

- Mandatory Response – §114 of the CAA
- EPA's Tool for Future Rulemaking and Policy



# EPA ICR No. 2548-01

- Collect data on oil & gas sources
  - **Existing sources**
- ICR has two parts:
  - Part 1: Operator Survey
  - Part 2: Detailed Facility Survey
- Required to report under authority of §114 of CAA



<https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/oil-and-gas-industry-information-requests>



# EPA ICR No. 2548-01

- White House Climate Action Plan (WHCAP) to reduce GHG emissions
  - USEPA's implementation
  - Oil and gas industry is key sector
  - Reduce methane emissions pursuant to §111(d) authority of the CAA



# Who is Required to Report

Onshore petroleum and natural gas production

Onshore petroleum and natural gas gathering and boosting

Onshore natural gas processing

Onshore natural gas transmission compression

Onshore natural gas transmission pipelines

Underground natural gas storage

LNG import and export equipment

LNG storage



# Who is Required to Report

## Part 1

### **Operator Survey**

- ALL OPERATORS MUST RESPOND
- Corporate & operator-level info
- Counts for key equipment

## Part 2

### **Detailed Facility Survey**

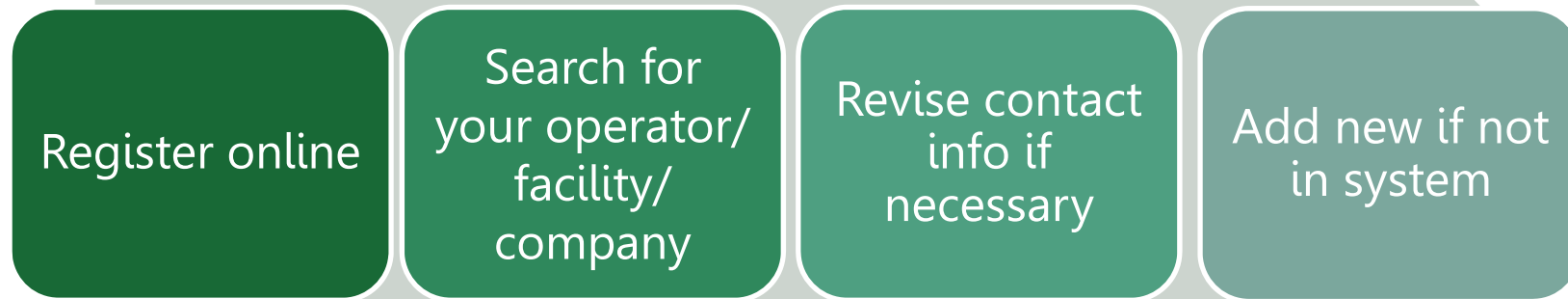
- "Statistically valid number of facilities" will receive Part 2 Survey
- Specific Operators and Facilities – TBD





# Contact Information

<https://oilandgasicr.rti.org/>



# Contact Information

<https://oilandgasacr.rti.org/>



Register

Log In

## Register

Use the form below to create a new account.

Passwords must be a minimum of 8 characters in length.

### Account Information

First Name

Username

Last Name

Password

Company Name

Confirm Password

Role

Email

Role Description

Confirm Email

Phone

Register



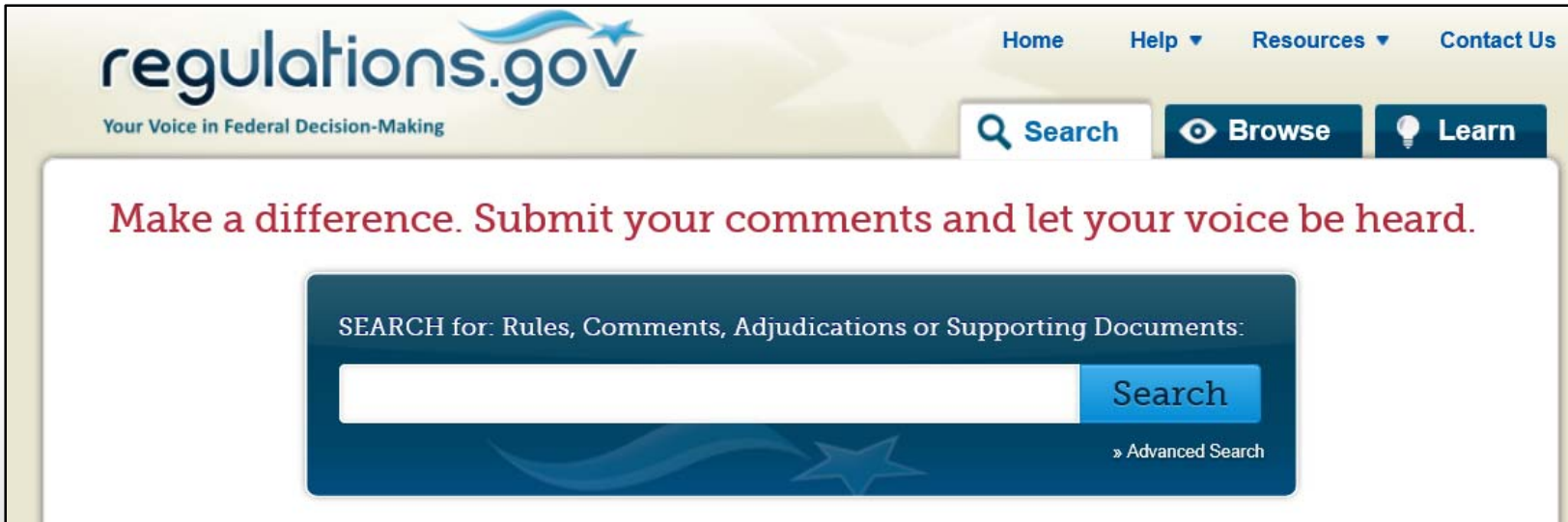
# Comments

- Spring 2016 – Initial draft ICR
  - August 2<sup>nd</sup> – First comment period closed
- September 2016 – Second draft ICR
  - October 31<sup>st</sup> – Final comments due
- Anticipated issuance to all operators in November



# How to Comment

- <http://www.regulations.gov>
- Click on search box
- Enter Docket ID number: EPA-HQ-OAR-2016-0204
- Click "Search" → click "Comment Now"
- Follow directions



The screenshot shows the homepage of regulations.gov. At the top left is the logo "regulations.gov" with the tagline "Your Voice in Federal Decision-Making". To the right are navigation links: "Home", "Help", "Resources", and "Contact Us". Below these are three buttons: "Search" (with a magnifying glass icon), "Browse" (with an eye icon), and "Learn" (with a lightbulb icon). A large red banner reads "Make a difference. Submit your comments and let your voice be heard." Below the banner is a search box with the text "SEARCH for: Rules, Comments, Adjudications or Supporting Documents:". The search box contains a white input field and a blue "Search" button. To the right of the button is a link "» Advanced Search".



# Part 1: Operator Survey

- Onshore petroleum and natural gas production facilities
- General Information
  - Parent Company
  - Field Operator Office
    - Separate operator offices require their own worksheet
- Site Information
  - Centralized Production Surface Sites
  - Well Surface Sites



# Part 1: Centralized Production Surface Site

- Obtains crude oil or natural gas directly from multiple well surface sites
- No custody transfer
- Includes all equipment used in transportation, compression, stabilization, separation, storing or treating of crude oil and/or natural gas (including condensate) located at surface sites



# Part 1: Well Surface Site

- One or more surface sites
- Constructed for drilling and subsequent operation of any oil well, natural gas well, or injection well
- Limited to well(s) and equipment at disturbed area of land associated with the well(s)
- Excludes equipment at centralized production surface site



# Part 1: Site Information

Similar information requested for both Centralized Production Surface Sites & Well Surface Sites:

- General information, such as Site ID, name, location, etc.
- Applicability of 40 CFR Part 60 (**not Part 63!!!**)
- Several yes/no questions
- Equipment inventory: Separators, tanks, etc.

**4.) For each well surface site (see definitions) under the control of t**

**Provide an ID, description and general information about each well surfa**

Surface Site ID (Permit or other ID number, as applicable)	Surface Site Name/De
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# Part 1: Site Information Cont.

Additional requested details for Well Surface Site info:

- Includes producing wells, temporarily shut-in, permanently plugged wells, storage wells, and injection wells
- Must provide well type
  - 16 choices from pre-determined list
- Was well hydraulically fractured?
- Up to 20 wells per pad – need more? (comment)
- EPA estimates amount of time required

EPA estimates the industry cost of responding to the ICR at about \$37 million: \$16 million to respond to the operator survey (or about \$1,100 per operator); and \$21 million to respond to the more detailed facility survey (or about \$5,600 per facility.)



# Part 1: Deadline

- Part 1 – Operator Survey
  - Anticipated issuance – November
  - Due within 30 days of ICR issuance
  - Submittal Process

<https://oilandgasicr.rti.org/>



# Part 2: Detailed Facility Survey

- Selected facilities across industry segments
- General facility information
- Control device(s)
- Emission-source specific
  - Production or Injection/storage wells
  - Tank Separators
  - Equipment Leaks
  - Compressors
  - Pneumatics
  - Acid Gas Removal Systems
  - Dehydrators
  - Blowdowns



# Part 2: Detailed Facility Survey

Mandatory actual data:

- Financial information
- 2015 Production
- Detailed pneumatic device counts
- Detailed equipment leak component counts
- If separators or storage vessels present
  - Flash analysis is required
    - Must obtain if not readily available
    - Limited lab availability
- Confidential business information



# Part 2: Deadline

- Part 2 – Detailed Facility Survey
  - Anticipated issuance – Early November
  - Concurrent with Part 1
  - Due within 120 days of issuance
  - e-GGRT



# How to Plan Ahead

- Read
- Identify - Data Management
  - Determine if records already exist
    - Who
    - Where
  - Determine missing information
    - Most efficient way to obtain
    - Timing
- Delegate
  - Start collecting information
  - Track



# Action Items

- Operator registration: <https://oilandgasicr.rti.org/>
- Comments: <http://www.regulations.gov>
- Deadlines
  - Part 1 Survey
  - Part 2 Survey
- Data Management
  - Start collecting information now
  - Evaluate OOOO and OOOOa applicability
  - e-GGRT



# THANK YOU!

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