



On 12 May 2016, EPA issued a Draft Information Collection Request (ICR) that, when finalized, will require oil and natural gas facilities to provide EPA with extensive information about certain facility operations.

If approved by the Office of Management and Budget, EPA anticipates issuing ICRs under Section 114 of the Clean Air Act by 30 October 2016. This information will be used as necessary to develop regulations to reduce methane emissions. Companies would be required to complete Part 1 within 30 days and Part 2 within 120 days of receipt.

PART 1 Operator Survey

Part 1 requests administrative information for the operating company and limited information (e.g. equipment counts) for each onshore oil and natural gas production facility operated by the company, defined as “any onshore facility that contains a well drilled for the purpose of producing crude oil or natural gas, and includes all equipment used in the production, extraction, recovery, lifting, stabilization, separation, storing or treating of crude oil and/or natural gas (including condensate) ... at the facility.”

PART 2 Detailed Facility Survey

The information collection requirements for Part 2 are extensive and may include confidential business information related to wells, atmospheric storage tanks, separators, pneumatics, acid gas removal units, dehydrators, equipment leak fugitives, compressors, blowdowns, and control devices from the following onshore industry segments:

- petroleum and natural gas production, gathering and boosting;
- natural gas processing, compression and transmission;
- underground natural gas and LNG storage; and
- LNG import and export equipment.

Most information should be available from operations and engineering design records.

Potential Testing Required

Part 2 requires information on feed composition to each atmospheric storage tank. The analysis on pressurized samples from the upstream separator must follow California Air Resource Board (CARB) referenced methods. Once determined, the composition can be input to models such as the American Petroleum Institute’s E&P TANKS to estimate flashing, working and standing losses from storage tanks.

Geosyntec Oil & Gas Services

Geosyntec routinely assists clients with regulatory compliance and emissions testing, including equipment inventories, review of operating and engineering data, test management, and QA/QC of test procedures and analytical reports. Our experts can help guide you through the evolving state of methane emissions, regulation and reporting as it affects oil and gas operators.

Of note, Geosyntec personnel participated in studies for the Texas Commission on Environmental Quality to evaluate flash emissions from atmospheric natural gas condensate and produced water tanks.

FOR MORE INFORMATION:

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