

New Air Quality Regulation “NSPS 0000”

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NSPS 0000

- * **New Source Performance Standard (“NSPS”) 0000 - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution**
- * **Published August 16, 2012**
- * **Compliance Date October 15, 2012**

Well Completions

- * Applies to each hydraulically fractured/refractured well drilled (commenced construction, modification, or reconstruction) after **August 23, 2011**
- * Hydraulically fractured/refractured includes wells fractured w/ Water, Nitrogen, and/or Carbon Dioxide

Well Completions

- * Each well drilled after **8/23/11** and before **1/1/2015**
- * Flowback Operations - reduce VOC emissions with a completion combustion device (typically a flare) on or after **October 15, 2012**
- * **Completion Combustion Devices must be equipped with a “reliable continuous ignition source”**
- * Sources have a general duty to safely maximize resource recovery and minimize releases to the atmosphere

Completion Combustion Devices (aka Flares)



Well Completions

- * Wells drilled **on or after January 1, 2015**
- * **“Green Completions”** - route recovered liquids into storage vessels or re-inject the liquids into the well or another well and route recovered gas into a gas flow line, collection system, re-inject into the well or another well, or use as fuel, **“with no direct release to the atmosphere”**
- * Salable quality gas must be routed to the flow line

Well Completions

- * **Two (2) day Notification** - prior to commencement of each well completion beginning **October 15, 2012**
- * Electronically Notify DEP and EPA by using DEPOilandGasSector@wv.gov and r3wellcompletion@epa.gov
- * Instructions and form available on DAQ's website www.dep.wv.gov/daq

Well Completions

- * Must maintain a **daily log** for each well completion operation
- * Records of duration of flow into a line; duration of combustion; duration of venting
- * Specific reasons for venting in lieu of capture or combustion
- * Digital photographs of all the equipment used during flowback with specific location

Well Completions

- * **Annual report - for each well** the report must provide any deviations where well completion operations were not performed in compliance
- * Must be certified by the responsible official

Storage Vessels

- * **Storage Vessels** - installed **after 8/23/11** with VOC emissions of **six (6) tons/year or greater (each vessel)** and that are located at the well site more than 180 consecutive days
- * Install air pollution control equipment to reduce VOC emissions by 95% and monitor this equipment by **October 15, 2013**
- * DAQ's permitting threshold is **6 lbs VOC/hr (144 lbs/day)** for the entire well site **“Potential Emissions Not Actual Emissions”**





Storage Vessel –
Combustor Control Device
“Thermal Vapor
Incinerator”

(aka Enclosed Flare)



07/30/2012

Pneumatic Controllers

- * Pneumatic controllers - installed after 8/23/2011 (extraction) & 10/15/2013 (wellhead to extraction)
- * Reduce VOC emissions at wells (6 scf/hr or less bleed rate) and processing plants (zero bleed rate) by using a low bleed or no bleed design by **October 15, 2013**
- * **Exemption** based on functional needs, including but not limited to response time, safety and positive actuation

PNEUMATIC
CONTROLLER



ANTIFREEZ



Compressor Engines after 8/23/2011

- * Reciprocating compressors before extraction - reduce emissions by the replacement of rod packing (**every 26,000 hours of operation or 3 years**) *well site engines are exempt
- * Centrifugal compressors (Wet Seal) - required to install air pollution control equipment to reduce emissions by 95% and to monitor this equipment



Other Big Changes

- * **MACT Subpart HH – Dehydration Unit Updates**

- * **Annually** update Wet Gas Analysis and GLYCalc determination ; if the station's actual emissions are greater than 50% of major source thresholds (storage vessels included, not engines)

- * Updated samples and GLYCalc determinations by **October 12, 2012** or within one year prior

- * Must use the **maximum** designed glycol pump recirculation rate when determining major source status

- * Must include storage vessels in determining major source status of HAPs (excludes surge control vessels and knockout vessels)

Other Big Changes

- * **NSPS KKK Replaced with NSPS OOOO**
- * LDAR requirements at Extraction Plants that commenced construction, modification, or reconstruction after August 23, 2011
- * Lowered some leak definitions

EPA Agrees To Reconsider Oil and Gas Rules

- * EPA intends to conduct administrative reconsideration process for NSPS just issued 1/16/2013
- * Sign by March 29, 2013, a notice of proposed rulemaking addressing certain NSPS issues on an expedited basis;
- * Take final action with respect to those issues by July 31, 2013;

MACT ZZZZ RICE Engines Rule Updated

- * Compliance dates have changed
- * New exemption for existing engines defined as “Remote” stationary RICE
- * Remote RICE exempt from most emission testing requirements
- * Must evaluate the status of their “Remote” stationary RICE every 12 months

Questions?

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