

**OVERVIEW OF THE “PROPOSED”
NEW SOURCE PERFORMANCE
STANDARDS FOR OIL AND
NATURAL GAS INDUSTRY: THE
GOOD, THE BAD AND THE UGLY**

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NEW SOURCE PERFORMANCE STANDARDS

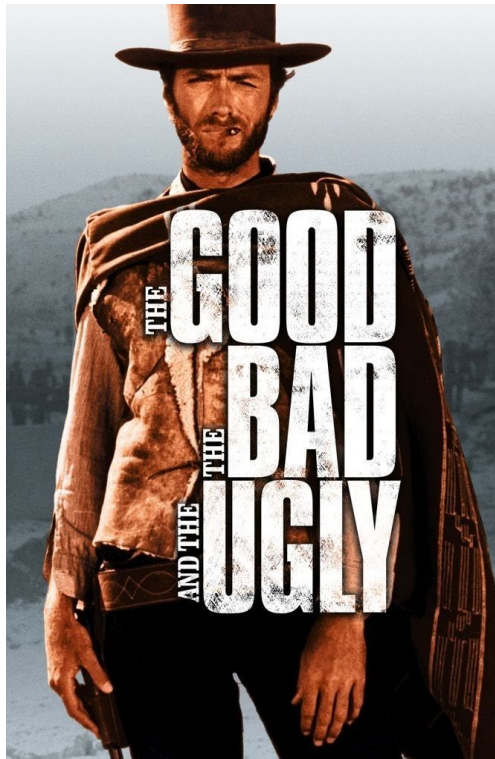
Four Significant “Proposals” on November 15, 2021:

- Changes to Subpart 0000a
- Introduction of Subpart 0000b
- Introduction of Subpart EG 0000c
- Revisions to Existing Regulations/CRA – Not Seeking Comment
- Proposed Appendix K – Optical Gas Imaging Protocol

NEW SOURCE PERFORMANCE STANDARDS

- Comments now due 1/31/2022
- 153 pages of Federal Register text – no regulatory text
- Supplemental proposal containing regulatory text in early 2022
- Separate rulemaking to revise §111(d) regulations

NEW SOURCE PERFORMANCE STANDARDS

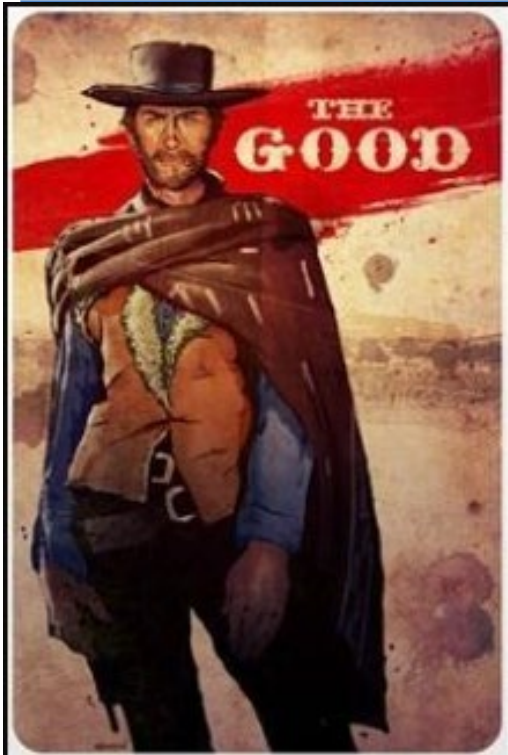


**The Limited Good: Certain
Technical Amendments from
2020 Revisions Retained**

**The Bad: Seeking Comments
on Additional Emission
Sources**

The Ugly: EG 0000c, 0000b

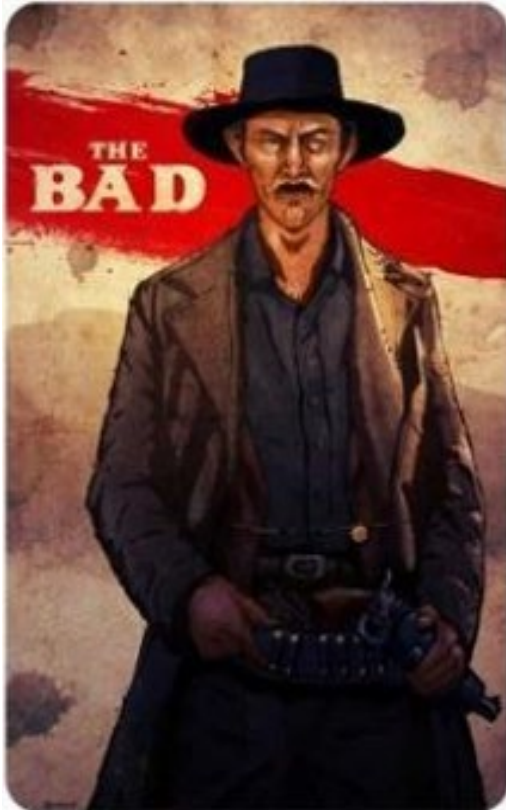
NEW SOURCE PERFORMANCE STANDARDS



Retained the following revisions from the 2019 Technical Rule:

- Well Completions – location of separator; definition of flowback; screenouts, coil tubing cleanouts not part of flowback
- Kept recording keeping revisions
- Pneumatic Pumps – technical infeasibility
- Boilers and Process Heaters not control devices
- Closed Vent Systems – can use in-house engineer to certify requirements met
- Fugitive Emissions at Well Sites/Compressor Stations

NEW SOURCE PERFORMANCE STANDARDS

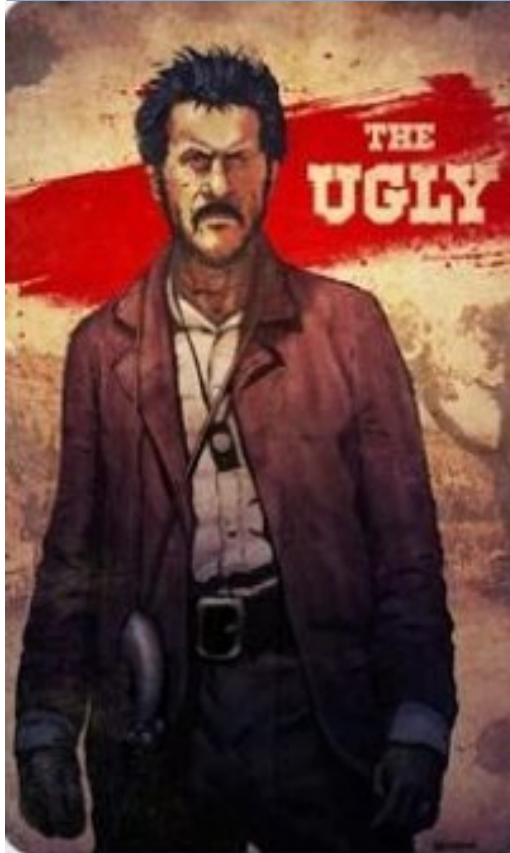


Potential Additional Emission Sources to be Controlled/Regulated:

- Abandoned Wells
- Pigging Operations and Related Blowdown Operations
- Tank Truck Loading
- Increasing Stringency of Control Efficiencies

Outlier: Definition of Hydraulic Fracturing

NEW SOURCE PERFORMANCE STANDARDS



EG 0000c Presumptive Standards – Generally the Same as for New Sources:

- Numerical Standards – more from Jim Locke
- Non-numerical standards (Fugitive Emissions)
 - <3 TPY – initial emission survey to demonstrate < 3 TPY
 - >3 TPY – quarterly OGI per Appendix K, first attempt to fix w/in 30; final repair w/in 30 of first attempt
 - Co-proposal: 3-8 tpy – semiannual OGI, same re: repairs
 - Co-proposal: >8 tpy – Quarterly OGI, same re: repairs
 - Pneumatics/Recip Compressors