

*“Smart People
Solving Problems”*

Buys & Associates, Inc. is an environmental consulting firm that specializes in defining and resolving your environmental issues.

B&A realizes that time and accuracy can make or break a project. Our approach is to evaluate problems that either the client, the agency, or we have identified and then design and implement a program with cost-effective solutions.

B&A air quality specialists, biologists, geologists, paleontologists, archaeologists, NEPA experts, and other specialists provide a unique blend of technical expertise and regulatory knowledge. We understand how to approach even the most difficult projects. With our knowledge of regulatory requirements, you can count on us for practical and appropriate solutions to your environmental needs.

Greenhouse Gas Mandatory Reporting Requirements

Subpart W: Petroleum & Natural Gas Systems Proposed Rule Signed 3/22/2010

The United States Environmental Protection Agency (EPA) has published the Proposed Greenhouse Gas (GHG) Mandatory Reporting Rule for Upstream Oil and Gas activities. (40 CFR 98 Subpart W– Petroleum and Natural Gas Systems)

<http://www.epa.gov/climatechange/emissions/subpart/w.html>

Comments on the Proposed Rule are due within 60 days after publication in the Federal Register (Date TBD). Please note that previous comments submitted will not be considered by EPA in terms of this proposed rule.

In general, the proposed rule requires that (upstream) petroleum and natural gas facilities emitting 25,000 metric tons or more of carbon dioxide equivalent (metric tons CO₂e) must report GHG emissions to EPA on an annual basis. (Note: Combustion sources at any type of facility that emit 25,000 metric tons of carbon dioxide equivalent are already required to report under Subpart C)

Operations/Facilities subject to the proposed rule include:

- Offshore Petroleum and Natural Gas Production
- Onshore Petroleum and Natural Gas Production
- Onshore Natural Gas Processing Plants
- Onshore Natural Gas Transmission Compressions
- Underground Natural Gas Storage
- LNG Storage
- LNG Export and Import Equipment
- Natural Gas Distribution



BUYS & ASSOCIATES, INC.

Littleton, CO (303) 781-8211 • Grand Junction, CO (970) 245-0778
Vernal, UT (435) 781-1167 • Moab, UT (435) 719-2018

www.buysandassociates.com

Proposed Facility Definition:

Onshore petroleum and natural gas production facility means all petroleum or natural gas equipment associated with all petroleum or natural gas production wells under common ownership or common control by an onshore petroleum and natural gas production owner or operator located in a single hydrocarbon basin.

In essence, basically all equipment located in a production field may be subject to the mandatory reporting rules.

Reporting Requirements:

Reporting to be required starting with 2011. The first annual report (i.e. 2011) will be due March 31, 2012.

Examples of GHG emission sources at subject facilities include gas well venting, pneumatic devices, fugitives (valve, connectors, pressure relief devices, etc.), reciprocating compressor rod packing venting, storage tanks and portable non-road equipment (drilling, completion and work over rigs, skid mounted equipment, etc.).

Additional Requirements:

- Recordkeeping
- QA/QC Requirements
- Annual Fugitive Leak Monitoring
- Greenhouse Gas Monitoring Plan



B&A GHG COMPLIANCE SOLUTIONS

B&A's Air Quality Team is a leader and industry expert on air quality issues, especially related to green house gas. Not only is our technical staff up to date on proposed and changing regulatory requirements, they are constantly developing and implementing cost-effective solutions for clients throughout the U.S.

The B&A Air Quality Team provides a full range of green house gas compliance services, including:

- Data Gathering & Record Keeping Programs;
- GHG Inventories;
- GHG Monitoring;
- Emission Reduction Opportunities; and
- Customized Training Workshops

For more information on GHG regulations or compliance programs please contact:

Daniel Pring, *B&A Environmental Manager*
dpring@buysandassociates.com
(303) 781-8211 x273

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