

DEALING WITH EPA QUAD O

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On April 17, 2012, the EPA Administrator signed a suite of final air quality regulations affecting both the Production/Processing and Transmission/Storage sectors of the oil and natural gas industry. The final rules mandate the use of emission controls as well as work practices through two different air regulatory programs – New Source Performance Standards (NSPS) and National Emissions Standards for Hazardous Air Pollutants (NESHAP). The rules were proposed in the Federal Register on August 23, 2011. The rule went into effect October 15, 2012. This rule will have a major impact on how the Oil and Gas industry has been operating regarding waste gas emissions. Reverberations will be felt across the industry by these more stringent rules governing upstream exploration and production segment as well as the midstream segment. The largest source of waste emissions will be generated by storage vessels.

According to World Oil's estimate of oil producing wells, based on surveys of state agencies and company sources, indicates there are over 536,000 oil producing wells and 485,000 gas producing wells. A summing total of 1,021,000 active wells in the United States (US). These numbers are increasing as the price of oil is hovering around \$100/bbl as of February 2014. Also new discoveries of oil rich and gas plays throughout the US such as the Cline, Bakken, Eagle Ford are increasing drilling activity.

According to the Energy Information Administration (EIA) the rig activity was approximately 1950 per month for year 2012. The average time to drill a 10,000 foot well is 4 weeks. Therefore, 12 months x 1950 wells = 23,400 new wells. Assume 75% percent will go to central gathering systems tanks, resulting in 5850 tank batteries that will require emission control. The world demand for oil and gas is increasing; along with US efforts towards energy independence will cause the rig activity to remain in the 1900- 2000 range for the next 5 years. A conservative 5 year estimate would be 22,000 new tank batteries in the US that will need emission controls to meet the new required regulations.

Stakeholders operating in the industry should take careful notice. Technology advances in monitoring; identifying; and measurement have increased drastically in the last 10 years and are being used for inspection by both industry and government. Vapor recovery and other capture techniques have also improve with more reliability and better function controls from new technology. This will allow capture and recovery of emissions with economic payback while maintaining compliance. The increased recordkeeping/reporting and testing requirements will likely require additional staff or contract workers. The possibility of short-term regional equipment shortages may also exist due to the highly regional nature of the work and rapid implementation requirements.

STORAGE TANKS

New, modified or reconstructed 'storage tanks' that have the potential to emit over six tons per year of VOCs are required to reduce those emissions by at least 95%. A new site with no existing wells will have 30 days to determine potential emissions and another 30 days to install the tank and controls after April 15, 2014. New wells at existing sites are required to install tank controls at the time of startup. Storage tanks will be the largest source of waste emissions. Therefore, this area has the greatest opportunity for compliance requirements, combustion, vapor recovery and economic payback. A major point in the rule is that you count your emissions after a vapor recovery unit. Capture of the waste vent gas can exempt you from the rule with economic benefit.

COMPRESSORS

Compressors in the natural gas transmission and storage segments are not impacted, however all other segments of the oil and gas industry are subject to the rule. Centrifugal compressors with wet seal systems will be required to reduce VOC emissions. An initial test to demonstrate emission reductions is required. Reciprocating compressors must replace rod packing every 36 months or every 26,000 hours.

PROCESSING PLANTS

SO₂ emission must be reduced at natural gas processing plants by at least 99%; this applies only to plants that have sulfur production rates of five long tons per day or more.

OTHER IMPACTS

The rule also outlines strict new standards for glycol dehydrators, pneumatic controllers and lead detection and repair.

Subpart Quad O will affect the industry in a very real way. Short-term impacts include:

- Implementation of recordkeeping and reporting requirements
- Engineering requirements to install equipment as required by the regulations
- Acute and/or localized shortages of emission control equipment
- Operational and logistical challenges to ensure that new regulations are being implemented and upheld

Longer-term impacts include:

- Greater cost of production/processing/etc.
- Uncertain impact on future regulatory requirements such as greenhouse gases and ozone non attainment areas
- Development of infrastructure to meet industry requirements

What is relatively certain is the fact that the regulatory environment surrounding the development and production of oil and gas in the US will continue to become more complex. Historically, similar increases in waste and emission regulations occurred in the petrochemical industry 15 years ago. The outcome was an increase in productivity and efficiency. The new requirements should be looked upon as an opportunity to increase better operating efficiency and productivity. Industry players should begin preparing to comply with this regulation as soon as possible. Prior preparation and a strategic plan will help a company integrate these regulations as smoothly as possible. Common sense and conservation of this finite resource will cause everybody on both sides of regulatory rules issues to breathe easier

SOURCES:

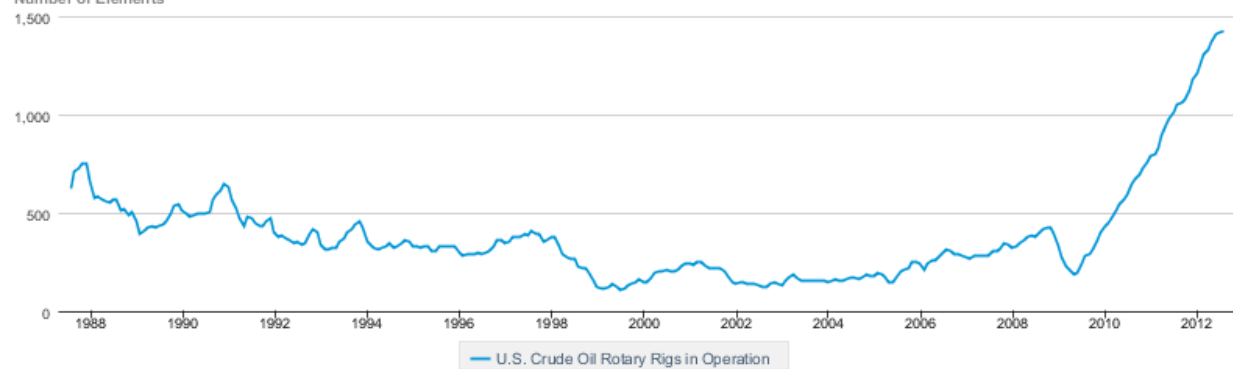
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U.S. Crude Oil Rotary Rigs in Operation

Number of Elements



Source: U.S. Energy Information Administration